Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

October 15, 2008

Bruce W. McClendon FAICP
Director of Planning

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

HEARING ON AMENDMENT TO COUNTY CODE TITLE 22 (PLANNING AND ZONING) TO ESTABLISH THE BALDWIN HILLS COMMUNITY STANDARDS DISTRICT (SECOND SUPERVISORIAL DISTRICT) (3-VOTES)

IT IS RECOMMENDED THAT YOUR BOARD, AFTER THE PUBLIC HEARING:

1. Consider the attached Final Environmental Impact Report (FEIR), the Environmental Findings of Fact and Statement of Overriding Considerations together with the comments received during the public review process, certify that it has considered the environmental information contained in the FEIR, that the FEIR has been completed in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines and County CEQA Guidelines and reflects the independent judgment of the Board as to the environmental consequences of the proposed CSD, that the mitigation measures identified in the FEIR regarding oil field operations are the only feasible mitigation measures and find on the basis of the whole record before the Board that the remaining, unavoidable environmental effects associated with potential future oil production operations at the Inglewood Oil Field have been reduced to an acceptable level and are outweighed by specific health and safety, economic, social and environmental benefits of the CSD as stated in the Environmental Findings of Fact and Statement of Overriding Considerations and adopt those findings and Statement of Overriding Considerations.

2. Approve the recommendation of the Regional Planning Commission to establish the Baldwin Hills Community Standards District (CSD) as reflected in the draft ordinance for the unincorporated portion of the Inglewood Oil Field located in the Baldwin Hills Zoned District to establish new development standards and operating procedures for oil and gas production operations to ensure that oil field operations are conducted in a safe manner and are compatible with the surrounding uses.

3. Instruct County Counsel to prepare an ordinance establishing the Baldwin Hills Community Standards District as recommended by the Regional Planning Commission.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

Oil and gas production of the Inglewood Oil Field located in the Baldwin Hills Zoned District dates back to the 1920s, when the area was largely undeveloped. Today these activities operate in the midst of residential, commercial, institutional and recreational uses. In recent years, residents within the vicinity of the oil field reported noise, odor, vibration, health, safety and visual impacts which they attributed to the operation of the oil field. This included an unusually large release of gas from an oil well drilling operation in January of 2006 which caused a strong odor. Residents were concerned that the fumes were toxic and reported the incident to local officials.

In response to community concerns, the Los Angeles County Board of Supervisors (Board) adopted Interim Ordinance No. 2006-0050U which temporarily placed additional development standards and restrictions on the drilling of new oil wells or deepening of existing oil wells on property zoned A-2 (Heavy Agricultural) or M-1-1/2 (Limited Heavy Manufacturing) in the Baldwin Hills Zoned District. The original interim urgency ordinance was adopted on June 27, 2006 for an initial period of 45 days and was subsequently extended on August 8, 2006 by Interim Ordinance No. 2006-0064U for another 10 months and 15 days. The interim urgency ordinance was extended a second time by Interim Ordinance No. 2007-0064U on May 29, 2007. The second extension ordinance also modified the initial interim urgency ordinance by temporarily placing a moratorium on the drilling of new wells or deepening of existing wells for a period of one year. Interim Ordinance 2007-0064U expired on June 26, 2008, however, in a letter dated July 1, 2008, the current operator of the oil field, Plains Exploration and Production Company (PXP) agreed to abide by the terms of the moratorium until October 2008.

The interim urgency ordinance also directed the Department of Regional Planning (Planning Department) to prepare a zoning study to explore the compatibility issues at the Inglewood Oil Field and the appropriate means to regulate oil field development in the unincorporated portion of the oil field. In its motion, the Board also indicated the need to undertake a comprehensive environmental analysis of oil field operations in the Baldwin Hills.

The zoning study, dated November 2006, recommended that a community standards district be created to provide specific standards for oil and gas production operations at the Inglewood Oil Field. The report based its recommendation on the following:

- Section 22.44.090 of the Los Angeles County Code provides for the establishment of CSDs "to provide a means of implementing special development standards contained in adopted neighborhood, community, area, specific and local coastal plans within the unincorporated areas of Los Angeles County, or to provide a means

of addressing special problems which are unique to certain geographic areas within the unincorporated areas of Los Angeles County."

- A Baldwin Hills CSD would establish specific development standards and operating procedures for oil and gas production activity at the Inglewood Oil Field to ensure that operations continue in a safe manner and are compatible with the surrounding residential, institutional and recreational uses. The regulations contained in a Baldwin Hills CSD would apply exclusively to the unincorporated portion of the oil field, and would be designed to minimize impacts from the oil production operations on the multiple communities that surround the oil field, including Blair Hills, Baldwin Vista, View Park, Windsor Hills, Ladera Heights, Culver Crest and Culver City, while allowing the oil field operations to proceed in a safe and efficient manner.

- The CSD adoption process would provide a discretionary review of the oil field operation which would require that an environmental document be prepared under California Environmental Quality Act (CEQA) guidelines. An Environmental Impact Report (EIR) would provide information about current and future operations, evaluate the impacts associated with those operations and establish mitigation measures for anticipated impacts. Any mitigation measures identified by the EIR would be incorporated directly into the CSD as development standards.

On March 6, 2007, pursuant to Section 22.44.040 of the County Code, the oil field operator, PXP, filed an application to establish the Baldwin Hills CSD for the unincorporated portion of Inglewood Oil Field. While this is the first CSD filed by an operator or property owner, the County's review and procedural steps were the same for any comparable process.

As part of its application, PXP developed a draft Baldwin Hills CSD using an outline provided by the Planning Department. The applicant-proposed Baldwin Hills CSD was submitted to the Planning Department for review and environmental analysis on January 8, 2008. To help with its independent review of the applicant-proposed Baldwin Hills CSD, Planning Department staff conducted its own research on other oil codes in the region to identify best practices in oil field regulations, consulted with over 30 representatives of various county, regional and state agencies, analyzed existing conditions on and around the field, and consulted with interested parties.

Pursuant to CEQA, the Planning Department initiated an EIR to assess the impacts that could result from potential future oil field development at the Inglewood Oil Field and to assess the adequacy of the development standards contained in the applicant-proposed CSD. Due to the nature of health and safety issues expressed by members of the community, it was necessary to commence the environmental analysis in a timely fashion. To promptly mobilize the resources needed for the environmental review, the Planning Department entered into a Three-Party Agreement with PXP and Marine Research Specialists (MRS) for the preparation of the environmental document. The County then partnered with the environmental consultant to hold a series of early outreach meetings with residents and other stakeholders to discuss their concerns regarding the oil field. This input formed the basis for the EIR analysis which had the following three main goals:

1. Provide the public and decision makers with detailed information about the current and future operations at the Inglewood Oil Field;

2. Identify potential environmental impacts from future oil field development activities; and

3. Assess if the CSD as proposed by PXP had the necessary development standards, operating requirements and procedures to mitigate the potential environmental impacts.

In July 2008, following release of the Draft EIR (DEIR) for public review, the Planning Department in partnership with the EIR consultant held four neighborhood meetings and two large-scale community meetings to take in comments on the applicant-proposed CSD and the DEIR.

The Regional Planning Commission (RPC) held six public hearings concerning the Baldwin Hills CSD on August 2, 2008, August 14, 2008, August 27, 2008, September 10, 2008, October 1, 2008 and October 8, 2008. The RPC heard testimony from the oil field operator in general support of the CSD; from members of the public in support of the CSD with recommendations to strengthen certain provisions; from members of the public in opposition to continued oil production in the Baldwin Hills and support for oil field conversion to parkland; and from current oil field landowners in general support of the CSD but with concerns about potential inverse condemnation of the oil field properties if the CSD included provisions requiring oil field conversion to public parkland.

Throughout the RPC hearing process, staff received numerous letters and emails both in support of the CSD and in opposition to continued drilling in the Baldwin Hills. Opposition comments included concerns about: long term public health effects from exposure to toxic vapors; vibration impacts on nearby properties from drilling activity and the gas plant flare; subsidence and potential seismic activity generated by drilling and water injection; potential catastrophic accidents caused by a seismic event, a gas explosion, oil spill, release of hazardous materials, and fires; water and soil contamination; soil erosion and property damage; dust impacts; noise impacts from drilling and back-up alarms; nighttime glare and visual blight; potential loss of property values, and, the desire for eventual conversion to parkland.

Following the RPC public hearings and numerous meetings with the oil field operator, county agencies, and community representatives, the Planning Department, in consultation with the EIR consultant, prepared four revisions to the Draft Baldwin Hills CSD. Theses revisions were made to incorporate the mitigation measures identified in the DEIR and address issues expressed by the community through comments provided at the RPC hearings, comment letters and emails, and the Planning Department's outreach efforts.

Draft Baldwin Hills CSD Overview

The Draft Baldwin Hills CSD is intended to establish additional regulations, safeguards and controls for activities related to drilling for and production of oil and gas within the unincorporated portion of the Inglewood Oil Field to ensure that oil field operations are conducted in a safe manner and in harmony with adjacent land uses. The mitigation measures identified in the DEIR were incorporated into the proposed CSD to provide the necessary development standards and regulations to minimize potential adverse impacts of oil field operations. Additional provisions were also added to the proposed CSD to address community concerns. The additional provisions include:

- Air Quality and Public Health: Require continuous air quality monitoring and testing of abandoned wells; Require higher standards for emission control devices used on drill rig and construction equipment engines.

- Geotechnical Evaluation: Periodic monitoring of ground movement to detect subsidence through use of remote sensing and the installation of an accelerometer. Consultation with DOGGR for the correction of any verified impacts.

- Emergency Contact and Response: The use of ombudspersons to respond to complaints on a 24-hour/7-day per week basis; Emergency Response Plan. Require annual emergency response drills and a Community Alert Notification System.

- Fire Protection: Fire protection audits; Fire prevention mitigation measures.

- Monitoring and Enforcement: Periodic compliance monitoring. The use of an Environmental Compliance Coordinator with technical expertise necessary for the technical review of facility operations; Imposition of fines for violations ranging from $1,000 to $10,000 per day per violation.

- Noise Attenuation: A program of measures to reduce noise impacts including a quiet mode of operation at specified hours of the day.

- Setbacks: Setbacks specified for drilling and redrilling operations from developed areas and public roadways..

- Vibration Control: The installation of a new flaring device that better controls gas emissions that can cause vibration and improve air quality.

- Visual: Requirements for the removal of unused equipment and the beautification of drill sites and other portions of the property with landscaping; required submittal of a landscaping and well pad revegetation plans.

- Water Quality: Provisions that address spill containment and the monitoring of groundwater quality,

- Advisory Committee: Require the establishment of a Community Advisory Panel (CAP) and semi-annual meetings.

- Public Agency Coordination: Require the establishment of a Multiple Agency Coordination Committee (MACC) to discuss permitting and enforcement issues concerning the Inglewood Oil Field.

- Periodic Review: Require that the CSD undergo review every five years.

- Compliance Programs: Environmental Quality Assurance Program (EQAP) and a Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP).

- Permit Processing: Director's Review required for new drilling and production operations for a maximum of 53 wells per year, provided the subject wells have been previously approved as part of an annual drilling plan and comply with the development standards and requirements of the CSD; Conditional Use Permit required for wells drilled in excess of 53 wells per year, for a steam plant, for water treatment and water softening facilities, for oil heating facilities and the installation of storage tanks with a capacity of 5,000 barrels or greater.

- Community Notification of Oil Field Activity: The submittal to the community of an annual drilling plan; CAP to review and comment on the required annual drilling plans that specify anticipated drilling activity for the following year. Require the establishment and maintenance of an Inglewood Oil Field website to provide up-to-date information on oil field activity; Require an annual newsletter.

- Abandonment and Site Cleanup: Requirements to submit plans for well abandonment and site remediation.

- Financial Mechanisms: The establishment of draw-down accounts and performance bonds that ensure funding for monitoring, enforcement, compliance and remediation.

The Draft Baldwin Hills CSD includes a number of plans and programs that will require additional technical guidance to implement and review. To facilitate the implementation of the CSD, the Planning Department is preparing detailed implementation guidelines to be completed when the CSD is adopted by the Board of Supervisors.

On October 8, 2008, the RPC considered the fourth revision to the Draft Baldwin Hills CSD and found that the CSD was consistent with the Los Angeles County General Plan and that it contained the necessary safeguards to ensure that oil field operations are conducted in a safe manner and are compatible with the surrounding uses. The RPC then closed the public hearing and recommended that the Board certify the Final Environmental Impact Report (FEIR) and adopt the Baldwin Hills CSD, as indicated in the draft ordinance with the following additional recommendations for the Board to consider:

- Consider requiring a revised Health Risk Assessment to address remaining community concerns;

- Consider requiring monitors along the fault line to monitor for migrating gases along fault lines;

- Consider establishing a mechanism for subsidence-related complaints

Staff has also recommended changes to the enforcement provisions of subsection 22.44.xx I. 1 of the CSD regarding penalties and violations. The recommended change is attached.

IMPLEMENTATION OF COUNTYWIDE STRATEGIC PLAN GOALS

The proposed CSD promotes Goal 1 of the County's Strategic Plan pertaining to "Service Excellence" through the development of clear and reasonable development standards and operating procedures for oil production activity in the unincorporated portion of the Inglewood Oil Field demonstrating that the Department of Regional Planning is responsive to citizens' concerns and ready to work with community groups to address such concerns.

FISCAL IMPACT

Implementation of the proposed amendment will not result in any significant new costs to the Department of Regional Planning or other County departments or in any loss of revenue to the County. Adoption of this amendment will result in the need for additional departmental staffing, however, the proposed CSD will establish a draw-down account to pay for County expenses for implementation, monitoring and enforcement of the CSD.

FINANCING

The proposed amendment will not result in additional net County costs and therefore a request for financing is not being made at this time.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

During the EIR scoping process and in the course of reviewing the applicant-proposed CSD and subsequently revising the CSD to incorporate the mitigation measures identified by the EIR, Planning Department staff held several outreach events at various locations in the area, including: a "meet and greet" meeting to introduce residents to the CSD approach and the environmental review process; several presentations made to homeowner's associations; three pre-scoping neighborhood meetings; two community-wide scoping meetings; four small-scale neighborhood meetings to discuss the applicant-

proposed CSD and DEIR; two large-scale community meetings to discuss the applicant-proposed CSD and DEIR; and consultations with public agencies and stakeholder groups.

The Regional Planning Commission conducted six public hearings concerning the Baldwin Hills CSD on August 2, 2008, August 14, 2008, August 27, 2008, September 10, 2008, October 1, 2008 and October 8, 2008. The RPC heard testimony from the oil field operator in general support of the CSD; and from members of the public both in support of the CSD, some with recommendations to strengthen certain provisions, and in opposition to continued oil production in the Baldwin Hills.

The proposed Baldwin Hills CSD standards and regulations, which include the mitigation measures identified in the DEIR, would ensure that oil field operations are conducted in a safe manner and are compatible with the surrounding uses. The potential impacts associated with potential future oil field operations as described in the DEIR, with the exception of seismic hazard and cumulative traffic impacts, would be reduced to a level of less than significance with mitigation. The remaining, unavoidable environmental effects associated with potential future oil production activity have been reduced to an acceptable level and are outweighed by specific health and safety, economic, social and/or environmental benefits of the project as stated in the Environmental Findings of Fact and Statement of Overriding Considerations incorporated herein for your consideration.

A public hearing is required pursuant to Section 22.16.200 of the County Code and Section 65856 of the Government Code. Required notice must be given pursuant to the procedures and requirements set forth in Section 22.60.174 of the County Code. These procedures exceed the minimum standards of Sections 6061, 65090, and 6586 of the Government Code relating to notice of public hearing. The date of the public hearing is set for October 21, 2008. Publication of a notice of this public hearing and posting of the notice on-site took place 30 days prior to the hearing date, as required and a supplemental notice announcing the Regional Planning Commission recommendation was published ten days prior to the hearing date. In addition, notices of this public hearing and the supplemental were mailed to all property owners in the Baldwin Hills Zoned District and within 1,500 feet of the District boundary, to property owners in the Blair Hills community of Culver City, and to property owners on the western side of Valley Ridge Avenue in the View Park Zone District.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

Approval of the proposed amendment to Title 22 will not significantly impact County services.

ENVIRONMENTAL DOCUMENTATION

Under California Environmental Quality Act (CEQA) guidelines, an Environmental Impact Report (EIR) was prepared for the establishment of the Baldwin Hills CSD to provide information about the current and potential future oil and gas production operations; to evaluate the environmental impacts that could result from potential future oil and gas

production operations; and to determine if the Baldwin Hills CSD as proposed by PXP has the necessary development standards and operating requirements to mitigate the potential environmental impacts associated with future oil and gas production operations. The Draft Environmental Impact Report (DEIR), dated June 2008, identified potential impacts in the following areas: safety and risk of upset, air quality, public health, geological resources, biological resources, water resources, traffic and circulation, land use, noise and vibration, recreation, fire protection and emergency response, cultural resources, and visual resources and aesthetics. The recommended mitigation presented in the Mitigation Monitoring Plan (MMP) and incorporated in the CSD address potential impacts associated with future oil production activity.

The remaining, unavoidable environmental effects associated with potential future oil production activity have been reduced to an acceptable level and are outweighed by specific health and safety, economic, social and/or environmental benefits of the project as stated in the Environmental Findings of Fact and Statement of Overriding Considerations incorporated herein for your consideration.

Respectfully submitted,

DEPARTMENT OF REGIONAL PLANNING

Bruce W. McClendon, FAICP
Director of Planning

BWM:RJF:sfr

Attachments:

1. Project Summary
2. Summary of Regional Planning Commission Proceedings
3. Resolution of the Regional Planning Commission
4. Recommended Ordinance for Board Adoption
5. Recommended change to Community Standards District Subsection 22.44.xx I.1
7. Environmental Document
8. Environmental Findings of Fact and Statement of Overriding Considerations
9. Legal Notice of Board Hearing
10 List of Persons to be notified

C: Chief Executive Officer
County Counsel
Executive Officer, Board of Supervisors
Auditor-Controller
Director, Department of Public Works
Assessor

ATTACHMENT 1: PROJECT SUMMARY

COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING

PROJECT SUMMARY

PROJECT DESCRIPTION:	Proposed amendments to Title 22 (Planning and Zoning) to establish the Baldwin Hills Community Standards District (CSD) to include development standards and operating procedures for oil production activity in the unincorporated area of the Baldwin Hills to ensure compatibility with surrounding residential, commercial, institutional and recreational uses.
REQUEST:	Adoption of the proposed amendments to Title 22; Case No. 200700570.
LOCATION:	Baldwin Hills Zoned District
APPLICANT OR SOURCE:	Plains Exploration and Production Company
STAFF CONTACT:	Dr. Russell Fricano at (213) 974-4885
RPC HEARING DATES:	August 2, 2008, August 14, 2008, August 27, 2008, September 10, 2008; October 1, 2008; October 8, 2008
RPC RECOMMENDATION:	Board public hearing to consider adoption of the proposed amendment.
MEMBERS VOTING AYE:	Commissioners, Bellamy, Valadez, Rew, and Modugno
MEMBERS VOTING NAY:	None
MEMBERS ABSTAINING:	Commissioner Helsley
KEY ISSUES:	Oil and gas production activity at the Inglewood Oil Field date back to the 1920s, when the area was largely undeveloped. Today, these activities operate in the midst of dense urban development. In recent years, residents within the vicinity of the oil field reported noise, odor, vibration, health, safety and visual impacts which they attributed to the operation of the oil field.

The compatibility of oil and gas production operations with surround residential, institutional and recreational uses is addressed through the establishment of CSD that set forth additional development standards and operating procedures for oil field operations at the Inglewood Oil Field.

The Environmental Impact Report provided information about current and future operations, evaluated the environmental impacts associated with potential future oil field development and assessed the adequacy of the development standards contained in the applicant-proposed Baldwin Hills CSD.

The CSD was revised by the Planning Department to incorporate the mitigation measures identified by the EIR and to strengthen provisions to address community concerns.

MAJOR POINTS FOR:

The proposed CSD incorporates the mitigation measures identified by the EIR in order to ensure that the CSD contains the necessary development standards and operating procedures to minimize potential impacts associated with potential future oil field development at the Inglewood Oil Field.

The proposed CSD addresses potential impacts associated with potential future oil and gas production operations, including: air quality, public health, safety and risk of upset, geotechnical, fire, visual character, water resources, noise and vibration.

The proposed CSD establishes a review procedure for oil and gas production operations that were previously not in place under the A-2 zoning designation. The CSD proposed a director's review for new wells up to a maximum of 53 wells per year, provided the subject wells are first approved as part of an annual drilling plan. The community will have information on proposed well drilling activity pursuant to the annual well drilling plan requirement.

The proposed CSD establishes mechanisms for on-going monitoring and data collection of ground

movement and meteorological conditions, which have previously not been available to the County.

The proposed CSD contains additional provisions to ensure on-going monitoring of oil and gas production operations by public agencies and the community through the creation of a multiple agency coordination committee and a community advisory panel.

The proposed CSD requires the establishment a draw-down account to pay for the County's costs of implementing, monitoring and enforcing the CSD.

MAJOR POINTS AGAINST:

Some members of the community expressed remaining concerns with some of the provisions in the proposed CSD. These include:

- The annual limit on the number of wells that can be processed through a director's review is too high.
- The director's review does not provide for notification of the public
- The CSD needs detailed implementation guidelines

Some members of the community expressed opposition to continued oil and gas production operations in the Baldwin Hills due to concerns about health, safety and seismic hazards due to drilling and water injection activity and a desire to transition the oil field properties into public parkland.

ATTACHMENT 2: SUMMARY OF REGIONAL PLANNING COMMISSION PROCEEDINGS

SUMMARY OF REGIONAL PLANNING COMMISSION PROCEEDINGS

The Regional Planning Commission (RPC) held five public hearings to consider the Baldwin Hills Community Standards District (CSD) and associated Draft Environmental Impact Report (DEIR). One hearing was also held to consider the CSD and Final Environmental Impact Report (FEIR). Hearings opened on August 2; were continued to August 14, 2008, August 27, 2008, September 10, 2008, and October 1, 2008; and closed on Oct. 8, 2008. The August 2nd hearing was held in the community at West Los Angeles College and included a field trip of the areas surrounding the oil field for the RPC and members of the public. The August 14 hearing was held at the Consolidated Board of Realtists Hall. Subsequent hearings were held at the RPC hearing room in the Hall of Records or at the Board of Supervisors hearing room in the Hall of Administration, which allowed more space to accommodate the large crowds of interested observers and testifiers.

At the public hearings the RPC heard testimony from the project applicant, from several elected official, from numerous members of the public, and from many community organizations. The community and non-profit organizations included the Greater Baldwin Hills Alliance, the Community Health Councils, the National Resources Defense Council, Heal the Bay, the Southwest Association of Realtors, the Consolidated Board of Realtists, and homeowners associations representing the Windsor Hills, Baldwin Hills, Ladera Heights, Culver Crest, Culver Vista, and Baldwin Village neighborhoods. Staff and the environmental consultant also gave presentations. The following sections outline the testimony and presentations given by the applicant, public, and staff. The summary of RPC proceedings concludes with the issues discussed by the RPC, the actions they took, and their outstanding concerns and recommendations.

APPLICANT TESTIMONY

The applicant gave testimony at several of the hearings. Steve Rusch, representative of Plains Exploration and Production Company, spoke on several occasions to explain and support the proposed CSD and to answer the RPC's questions. Mr. Rusch explained who the applicant is, the background of the project, and the oil company's intent.

Plains Exploration and Production, or PXP, is headquartered in Houston and conducts about 80% of its operations in California. They are the operator of the Inglewood Oil Field, not the owner.

According to Mr. Rusch, the oil field operator applied to establish the CSD in an effort to work with the community to make future oil production operations compatible with surrounding uses. Mr. Rusch noted that existing operations are consistent with current zoning and the County's General Plan. However, recognizing that odors, noise, and vibrations exist at the field and after an

accidental release of odorous gases in 2006, the applicant took the step to apply for additional regulations in the form of the CSD. The applicant noted that the proposed CSD includes a provision for citizen participation and that PXP had already established an emergency telephone number to receive community complaints. Furthermore, Mr. Rusch noted that the 1,000 wells evaluated in the drilling scenario in the environmental document only had about a 10% chance of actually being drilled. According to Mr. Rusch, 20-25 wells drilled per year is consistent with historical averages.

In addition to Mr. Rusch, Mr. Charles Moore spoke on behalf of PXP as their attorney. Mr. Moore noted that this is not an application to drill or expand drilling, but an application for additional regulations and standards. Mr. Moore noted that existing oil production is promoted in the Los Angeles County General Plan. The CSD does not allow additional development that is not allowed by the General Plan nor does it propose new development. Mr. Moore also noted that the General Plan's Open Space Element protects mineral resources.

The applicant and their attorney also brought up several issues and concerns during the process. They suggested removing any references to the Baldwin Hills Park Master Plan in the draft CSDs, noting that this could equate to inverse condemnation. They also expressed concern over giving the Community Advisory Panel power to deny permits.

PUBLIC TESTIMONY

Public testimony was received at each of the six hearings for the project. The number of testifiers ranged from 14 on October 8 to 46 on August 14. At several hearings testimony was not received from all interested members of the public due to time constraints. Many people also testified at multiple hearings. In total roughly 170 separate testimonies were given on this project. The following section summarizes the public testimony and is organized into issues and concerns regarding the DEIR, oil drilling operations, CSD, and process. Testimony in support of the CSD is summarized following the issues and concerns.

Issues and Concerns Regarding the DEIR

Air Quality Analysis

Some testifiers expressed concern over the lack of independent air monitoring for the Air Quality analysis and questioned why the DEIR did not recommend on-going air monitoring as a mitigation measure. Testifiers suggested that toxic air contaminants be measured directly not through a computer model and that toxic pollutants from flaring, the accidental gas release in 2006, and additional soil gas studies be analyzed and included in the DEIR. Some testifiers also noted that construction air quality impacts were underestimated in the DEIR.

DEIR Content

Several testifiers expressed concern over the content of the DEIR, making suggestions for sections they thought should be included. Several noted that there was no discussion of the project's compatibility with the Baldwin Hills Park Master Plan, a Plan that is adopted by the state. Others questioned why the DEIR did not include a "no project [drilling]" alternative or an alternative with a reduced drilling scenario in the alternatives analysis. Testifiers noted that the DEIR was missing Appendices P, R, and Q. They also expressed concern that there was no section on hazardous materials. Testifiers also requested an expanded section on environmental justice and an assessment of social and economic impacts of the project.

DEIR Preparers

Many testifiers expressed concern over the qualifications of the Draft EIR preparers. They noted that consultants who were being paid by PXP could not be expected to have the community's best interest in mind. They specifically questioned some subcontractors' credentials, noting that some had been found guilty and fined for fraud. Testifiers questioned how the DEIR consultant and their subcontractors were chosen and vetted. Testifiers suggested that independent consultants are needed to audit safety, drilling, seismicity.

Drilling Methodologies

Several testifiers requested additional information on the methods of drilling currently used or planned for at the field. Specifically, testifiers noted that additional information was needed on deep drilling and slant drilling and their impacts. Several testifiers expressed concerns over whether slant drilling was occurring under their residences and requested maps depicting where such drilling is occurring or planned for.

Environmental Baseline and Thresholds

Several testifiers expressed concern over the baseline established for the DEIR analysis. In particular, testifiers questioned the establishment of a baseline that includes existing operations. Testifiers also questioned the thresholds used to evaluate noise, odor, and toxic emission impacts. Testifiers also suggested that the range of years chosen for the baseline, 2006-2007, may be inappropriately low.

Geology Analysis

Testifiers recommended that several aspects related to geology be further analyzed or included in the DEIR. Testifiers requested information on the impacts of deep drilling on soil stability and water quality. Additional information was also

repeatedly requested on existing faulting and fracturing. Testifiers noted that the operator should disclose information and any records on faulting, fracturing, subsidence and uplift.

Global Warming

Several testifiers questioned allowing ongoing drilling of fossil fuels that will contribute to global warming. They requested that the EIR evaluate impacts on global warming and that mitigation measures be included in the CSD to address these.

Public Health Analysis

Concerns were expressed about the health analysis conducted in the DEIR. Expanded discussion was requested on the safety impacts of flaring. Many testifiers questioned why several toxic pollutants were not included in the public health analysis and requested that the public health analysis address all 21 toxic pollutants. Many testifiers expressed concern that the DEIR did not include a door-to-door health survey or long term health study for the area. They questioned the methodology used in the DEIR, which relies on modeling to estimate how many cancer cases are attributed to the oil field uses. They noted that the acute health risks were underestimated and that the thresholds used were out of date. Testifiers were unsatisfied with this approach that had no review and cataloging of cancers or premature deaths and no active sensitive receptor zone study. Testifiers demanded a Health Impact Assessment be conducted that includes a health survey of the cancer, disease, and mortality rates that actually exist in the communities surrounding the oil field. With this in mind many testifiers suggested that the entire public health section be rewritten and that the DEIR be re-circulated after this revision.

Impact on Schools and Young Children

A testifier noted that Figure 4.2-5 in the DEIR does not show the entire area impacted by a potential odor event and does not identify impacted schools. Some testifiers also expressed concern that the DEIR did not explicitly address impacts from odor events on young children who may live, go to school, or recreate in the area.

Source of Data

Many testifiers questioned the accuracy of the data used for the DEIR. Much of the DEIR is based on data provided by PXP. Testifiers noted that this data is unreliable and that the oil field operator could not be trusted to provide data that accurately reflects its operations.

Issues and Concerns Regarding Oil Production Operations

In addition to the concerns raised over the DEIR, testifiers expressed concerns about oil production operations at the Inglewood Oil Field. These concerns are outlined below.

Future Use of Site as Park

Many testifiers expressed an impression or belief that the Inglewood Oil Field would be a State park by now. Several cited the state legislation that created the Baldwin Hills Conservancy and noted that the Baldwin Hills Park Master Plan envisions the site as a large public park. Testifiers noted that the previous owner, Chevron, promised that wells would be dry by the late 1980s and that at that time the land would be transitioned into a park for the community. In line with this promise and the State's intent, many testifiers expressed their desire for a "clean and green" site. Testifiers noted that current and ongoing oil field operations are incongruous with the future use of the site as a park.

Long Term Health Effects

Many testifiers expressed concern over health impacts on surrounding communities due to existing operations and future operations. Testifiers described strong fumes that are emitted from the field which cause them illness and discomfort. Others described teary and itchy eyes, asthma, and cancer clusters, which they attributed to oil field operations. Several testifiers were cancer survivors while others described friends and neighbors who they believed had prematurely died of cancer caused by the oil field operations. Many testifiers expressed fear over the unknown and possibly toxic fumes that they believed could impact their long term health. Many testifiers noted that the community has higher rates of cancer and morbidity than LA County in general and they questioned whether and to what extent this was caused by oil field operations. Testifiers also noted that the oil field operations may impact the health of children, seniors, and others who go to school or recreate near the oil field.

Property Damage and Rights

Many testifiers noted that they were personally impacted by oil production operations via damage to their homes and property. Testifiers suggested that this damage was caused by earth movement that was triggered by oil operations. Testifiers claimed that the foundations of their homes are being undermined. Some testifiers suggested that the oil field operator take financial responsibility for this damage. Several testifiers expressed concern that PXP is not properly insured to incur the responsibility to pay for property damage and that the fact that PXP could not get insurance should be a serious concern for the County since it may be liable for the damage caused by PXP. In addition to these

concerns over property damage, owners of the oil field properties testified that they also had rights that should be respected. Specifically, they cautioned against regulations that would amount to a taking or that would diminish their economic returns.

Soil Stability and Seismic Impacts

Many testifiers expressed serious concern, fear, and anxiety over the impacts of drilling on soil stability and seismicity. Testifiers questioned the safety of drilling in a known liquefaction area and next to or on top of the existing Newport-Inglewood Fault. Serious concerns were raised over whether this practice could cause additional faulting and a small seismic event that could trigger a larger catastrophic earthquake. Testifiers displayed pictures of cracks in their houses and foundations and questioned whether these were caused by oil drilling-related vibration. They were concerned that increased drilling in the future would exacerbate this property damage and that they would have no recourse for recuperating costs for the damages done. Testifiers were also concerned that removal of oil may cause liquefaction and subsidence.

Water Resources

Several testifiers expressed concern over impacts on existing water resources. These included potential for drilling, slant drilling, the steam plant, reinjection, or water flooding operations to contaminate the Ballona Creek, ground water, water table, and drinking water. Testifiers were also concerned over the use of scarce potable water for oil extraction operations.

Well Abandonment

Testifiers expressed concerns over previously abandoned wells at the oil field. They noted that many wells were abandoned before standards were in place and that these could be leaking or otherwise contaminating the environment. Testifiers suggested that every well should be re-abandoned to current standards. A testifier also expressed concern that only 10% of the abandoned wells were checked in the DEIR for leaks and cautioned that improperly abandoned wells may leak gases into the surrounding community and cause explosions.

Issues and Concerns Regarding the Proposed CSD

Annual Cap on Wells

Some testifiers argued that the annual cap of 85 wells identified in the CSD is too high. They noted that this would allow more wells than analyzed in DEIR and more than the historical average. Testifiers referenced a mailer PXP sent to the

community stating that only 15 wells would be drilled per year. They recommended that the annual cap on wells be only 20 wells per year.

Compatibility with the Baldwin Hills Park Master Plan

Some testifiers questioned why the County has not converted the remainder of the oil field into parkland as is the vision in the adopted Baldwin Hills Park Master Plan and why the CSD was not being used to accomplish this goal. Testifiers recommended that the CSD include provisions for transitioning areas of the oil field that are no longer used for production into open space and for consolidating future drilling. Some testifiers suggested that the CSD require one well to be abandoned for each additional well drilled, a plan for the eventual exit of oil field operations, or a fee mechanism to acquire land for park use.

Compatibility with Surrounding Uses

Although testifiers agreed that the oil field has been in operation for decades, several testifiers expressed concern that new technologies were not present when they bought their homes. Many also argued that the environment the oil field was operating in has changed, including the development of a dense residential area and recreational uses, making the oil field no longer compatible. Testifiers advocated for stringent CSD regulations to safeguard the public health and safety of the surrounding communities. Some suggested that the CSD establish a no-drilling buffer area to protect surrounding uses and landscaping to screen oil field activities from the neighboring communities. Several testifiers also requested that PXP not be allowed to expand its current drilling operations.

Enforcement/Implementation

Testifiers suggested that before drilling resume the CSD require that a list of conditions be met. They also suggested that the CSD not include a grandfathering clause that would allow existing uses to continue without meeting the requirements of the CSD. Testifiers expressed concerns over how effectively the CSD could mitigate the many impacts identified in the DEIR and how the County would monitor and enforce it. Some noted that the County does not have enough staff or resources to monitor and enforce the CSD. Others expressed concern over the self-governing CSD review body. Still other testifiers noted the high cost of implementation and requested that the draw down account stay at $500,000. Testifiers also advocated for meaningful penalties for non-compliance with the CSD. For ongoing implementation, testifiers suggested that the CSD be periodically reviewed and that citizens participate in this review.

Mitigation Strategy

Testifiers expressed concern over the strategy of identifying impacts and providing mitigation measures. In particular, some testifiers were concerned that

there are too many impacts to mitigate, and questioned whether the operation should be allowed to continue. Testifiers also noted that many of the mitigation measures required a plan to be prepared. They argued that planning documents do not mitigate impacts.

Permitting

Testifiers suggested several strategies for permitting new wells. Some proposed a two-tier approach with a director's review or other ministerial process for new wells up to a certain annual cap. Testifiers proposed that any wells requested above the annual cap would require a conditional use permit. Testifiers also suggested that the permitting process outlined in the CSD require public notification and provide the community a right to appeal permitting decisions made. Notification was specifically requested for slant drilling under residential areas.

Property Rights

Some testifiers who owned property or were shareholders cautioned that the CSD regulations are too stringent and that they could raise issues of eminent domain or inverse condemnation. They noted that the CSD should not infringe upon land owners' rights or PXP's vested right to drill.

Ongoing Monitoring and Plans

Many testifiers requested that the CSD require ongoing monitoring and reporting of oil field activities. These included ongoing monitoring for air quality by placing monitors around the perimeter fencing, ongoing subsidence monitoring, and ongoing soil sampling outside the fence lines. If monitoring found health or other impacts testifiers requested that the CSD require that the operator cease and desist until the impacts could be stopped or mitigated. Testifiers also suggested new plans, such as an evacuation plan, to be developed and suggested that examples of all the required plans be provided to avoid regulatory confusion.

Financial Obligations

Many testifiers suggested that the CSD require that the oil field operator pay for the impacts its operations have on the community. Some said that the CSD should address a community benefits agreement. Others suggested that a trust or foundation should be required by the CSD and that the moneys should be dispersed to the community for upkeep, preservation, capital improvements, community centers, streets, landscaping, repair for homes, health studies, children's programs, or other community improvements. Some testifiers also suggested that the CSD require a bond for the proper clean-up of the site. Another suggestion was to include a mechanism to compensate community members for property damage caused by the oil field operations.

Water Conservation

Testifiers suggested that the CSD require the use of reclaimed water for production operations and an integrated water management plan to conserve water.

Well Abandonment

Several testifiers suggested that the CSD should require that all abandoned wells be checked to determine if they need to be re-abandoned and that the operator plug and abandon wells that are no longer producing. Testifiers supported this and other measures that would require the operator to clean the site as they produced more.

Issues and Concerns Regarding Review Process

CSD Process

Several testifiers expressed concern over the DEIR evaluating the version of the CSD drafted by the applicant, which testifiers felt was a minimum effort. Testifiers urged the County to review the CSD prepared by the Greater Baldwin Hills Alliance (submitted to the RPC as additional material dated July 30, 2008) and to develop and/or release its own version of the CSD and allow additional time for community review. Testifiers found it unsettling that PXP wrote the first draft CSD and paid for the EIR.

Citizen Participation and Transparency

Testifiers expressed concern over a lack of transparency in the review process and the lack of data and access to experts to assist the community with review of the CSD and DEIR. One testifier recommended organizing a forum to discuss the entire project with state experts. Testifiers also expressed frustration at the limited time given at RPC hearings for their testimony, especially given the time taken up by elected leaders and the applicant. Several testifiers, including representatives of the LA Unified School district and land owners stated that they were excluded from participating because they were not notified of the project properly.

DEIR and CSD Public Comment Period

Many elected officials and members of the public requested an extension of the 60-day DEIR public comment period. The testifiers expressed concern that 60 days is not enough time to understand and comment on such a technical document. They urged the RPC to not rush a process that would have such a critical impact on the community's health and safety. The Culver City Council unanimously voted in support of such an extension and it was repeatedly

requested in person through testimony of their council members. Testifiers expressed that they were troubled by the speed of the review process, especially the fact that the FEIR was only available for less than a week before the final RPC hearing. Similar concerns were raised regarding the CSD. Testifiers thought that the County CSD was released too late, that proper notice had not been given of its release, and that too little time was given to review subsequent drafts. Testifiers suggested that this rushed process resulted in drafts that did not consider all public comments received.

DEIR Preparation

Some testifiers suggested that the DEIR preparation was premature since it was based on a very generic draft CSD that changed substantially throughout the review process. Testifiers suggested that the DEIR may need to be re-circulated since it did not evaluate the revised CSD. Other testifiers stated that a project EIR should never have been prepared for the CSD. They argued that the CSD would not result in any physical change in the environment and that therefore the "project" is too speculative to be evaluated in a project EIR. These testifiers suggested that a program EIR be prepared instead so that future development can have further CEQA evaluation. They argued that the CSD and project EIR would allow the oil field operator to bypass future review by allowing some drilling by right and that this would mean that the public process and notification would be circumvented. At the final hearing testifiers stated that the FEIR was not done and that the RPC should not take action until it was completed.

Testimony in Support of the CSD

The RPC also heard testimony from members of the public, such as oil field employees, royalty owners, and land owners, in support of additional regulations, the applicant-proposed CSD, and continued oil operations in the Baldwin Hills.

Many of these testifiers brought up the point that oil drilling will bring revenue into the community and that continued operations under the CSD will provide local jobs. Employees of the Operator noted that as those in closet contact to oil fuled operations, they were conifident Employees stated that they return money to the local economy by supporting local businesses. They also stated that they share residents' concerns about the environment and safety and that the CSD will protect them and the surrounding communities. Testifiers also stated that the CSD does a good job of providing environmental safeguards that will ensure that the oil field operator is on the cutting edge of technology. Some testified that the oil fields have a passive, tranquil quality and that they are a unique part of California's history that should be preserved.

STAFF PRESENTATIONS

Regional Planning

Dr. Russell Fricano, Section Head of the Communist Studies I section of the Department of Regional Planning made presentations at each RPC hearing. He explained the background of the project, including the decision to prepare a CSD and EIR. Dr. Fricano also summarized the numerous outreach events and meetings that had been held prior to the first RPC hearing. These summaries included a discussion of the major issues raised by community members and the ways in which the draft CSD and EIR addressed these issues. At subsequent hearings Dr. Fricano summarized the major components of the CSD and explained how these were changing were incorporated into each draft in response to comments received at community meetings, discussion with public agencies, testimony received at the public hearings and meetings with community representatives. Included in these presentations was a detailed, page-by-page description of the changes made to each CSD draft up until the fourth and final draft. With exception to the October 8 hearing, staff recommended that the Regional Planning Commission continue the public hearings to allow additional time for staff and public review and comment at each hearing. At the October 8, 2008 hearing staff recommended that the RPC close the public hearing and recommend adoption of the CSD and certification of the FEIR to the Los Angeles County Board of Supervisors.

Public Health

At the October 1, 2008 hearing, Dr. Paul Simon and Cyrus Rangan of Los Angeles County Public Health, with expertise on epidemiology and health effects, provided comments on the DEIR. They stressed that the health assessment in the DEIR was conducted properly. They also noted that a number of techniques requested by the community, such as door-to-door surveys, would not lead to conclusive results.

Environmental Consultant

Marine Research Specialists (MRS) the environmental consultant gave presentations and responded to questions at each hearing. This included presentations by John Peirson, Stephen Raddis and Luis Perez.

MRS stated that the CSD would result in a more comprehensive set of regulations than those that currently exist and that it is the environmentally superior alternative. MRS explained what major impacts were found as a result of their studies and what mitigation measures were developed to address these.

MRS also responded to questions regarding specific aspects of the DEIR. Their explanations focused on air quality, soil gas studies, gas kicks, odors, and the health risk assessment.

For air quality MRS explained that the facility has a permit to operate from AQMD and that their operations are subject to the requirements of that permit. The operator also submits annual emission inventories and these were used to set up the environmental baseline. To include impacts of the flare and drill rigs MRS used fuel use records.

For the soil gas studies MRS took samples for 10% of wells and found no alarming levels of leaking gas except in a few cases. In those cases MRS stated that PXP immediately abandoned those wells. MRS also noted that the CSD requires annual soil gas testing.

MRS also considered gas kicks. They focused on what can be done to reduce the risk of future gas releases. They noted that the CSD includes a provision to require a gas buster and flare. The flare would be required for all drilling in shale, where gas kicks are most probable. MRS stated that this would eliminate the possibility of a gas kick similar to the one that occurred in 2006.

Another area that MRS studied was odors. They surveyed the facility to identify sources of odors and discovered that tanks and the biofarms were responsible for most odors. For the tanks they included a mitigation measure that would require pressure sensors to be placed on takes to prevent tanks from venting. MRS stated that the biofarms are monitored by the Regional Water Quality Control Board and that the odors are associated with the process of turning the soil. MRS developed a mitigation measure for the CSD to require odor suppressants that break down odor-causing hydrocarbons.

MRS explained their methodology for studying the health impacts of oil field operations. They stated that the health risk assessment followed the methodology set by AQMD. MRS explained that the oil field is not the only source of emissions in the community. Based on their study, they established an acceptable baseline based on AQMD thresholds. They noted that the proposed CSD achieves a reduction in impacts that is slightly lower than the baseline. With the mitigation measures they noted that the oil field will have lower emissions than portions of land near the major roads in the area, La Cienega and La Brea.

Finally, MRS noted that in comparison to all other ordinances regulating oil field operations, the CSD was more stringent than any regulatory program for land based oil field operations they had observed

REGIONAL PLANNING COMISSION

Discussion

The RPC's discussion focused on questions, clarifications, and recommendations for the environmental study and draft CSDs.

RPC commissioners asked questions about ground shifting along fault lines, legal constraints to the County's ability to regulate the oil field, potential takings, well abandonment, water injection, tanks, slant drilling, the dollar amount of fines, subsidence and uplift, and the oil field operator's role in addressing property damage related to subsidence. They also suggested that well consolidation, health impacts, bonds, site clean-up, and preventing explosions need to be addressed in the CSD. The RPC also questioned why the annual cap on wells in the CSD was 53 and not 20. The RPC clarified that all County agencies would have access to the draw-down fund established in the CSD. Finally, the RPC inquired about indemnification and insurance provisions.

During these discussions the environmental consultant provided technical explanations. County Counsel also explained the limits to the County's authority. Counsel noted that the County does not have the authority to shut the field down; however they can regulate land use to make the use compatible with surrounding uses. Counsel explained that the County could use eminent domain to take the property, however they would have to pay fair market value to the land owners. Regarding the annual cap on wells, counsel explained that a nexus is needed to justify the maximum number of wells and that 53 is the number analyzed in the DEIR. Counsel also explained that the indemnification and insurance provisions are left to the CEO's discretion per County procedure. [County Counsel had also explained throughout the hearing process that the Baldwin Hills Park Master Plan was not an adopted County plan and was intended only as a visionary document.]

At the close of the public hearings, RPC members had some concluding remarks. They noted that the CSD is a living document, and that the advisory committee and panel that will be created through the CSD will provide for ongoing feedback. Through these mechanisms the community would have oversight and could serve as a watchdog. Commissioners were also assured by County Counsel that the CSD is legally sound. Commissioners noted that the CSD is needed to put controls in place at a time when the moratorium on drilling is about to expire. In comparison to another oil operation ordinance they had reviewed, the Baldwin Hills CSD was a better program. Finally, commissioners noted that the CSD is consistent with the General Plan and a benefit to the community.

Action Taken

At the October 8, 2008 hearing the RPC made two motions. They closed the public hearing and recommend certification of FEIR by a unanimous vote. In their

second motion four commissioners recommended approval of the CSD with one abstaining.

Outstanding Concerns and Recommendation

The RPC expressed several outstanding concerns and recommendations at the close of the public hearing. They recommended that:

1. a Health Impact Assessment be conducted;
2. the CSD require monitoring for migrating gases along fault lines; and
3. a mechanism be established through the CSD for residents to submit subsidence-related complaints.

ATTACHMENT 3: RESOLUTION OF THE REGIONAL PLANNING COMMISSION

RESOLUTION
REGIONAL PLANNING COMMISSION
COUNTY OF LOS ANGELES

WHEREAS, the Regional Planning Commission of the County of Los Angeles has reviewed the matter of an amendment to Title 22 (Zoning Ordinance) of the Los Angeles County Code related to the establishment of a Baldwin Hills Community Standards District (CSD); and

WHEREAS, the Regional Planning Commission finds as follows:

1. The Inglewood Oil Field is part of the Second Supervisorial District. The majority of the Inglewood Oil Field is located in unincorporated Los Angeles County within the Baldwin Hills Zoned District. The unincorporated portion of the Inglewood Oil Field is bounded on the north by the Kenneth Hahn State Recreation Area and the City of Culver City, on the east by the unincorporated communities of Windsor Hills and View Park, on the south by the City of Inglewood and the unincorporated community of Ladera Heights and on the west by the City of Culver City.

2. The unincorporated portion of the Inglewood Oil Field is designated as Open Space (O-S) in the Los Angeles County General Plan. The intent of the Open Space category is to maintain land in an open character for public safety, recreation, scenic enjoyment, resource production, and for the protection and study of natural ecosystems. Agricultural, recreational, and mineral extraction are defined as compatible land uses in the Open Space land use category.

3. The unincorporated portion of the Inglewood Oil Field is predominantly zoned A-2 (Heavy Agricultural). There is also one parcel zoned M-1 ½ (Restricted Heavy Manufacturing), and small regions of CPD (Commercial Planned Development), C-2 (Neighborhood Commercial) and R-3 (Limited Multiple Residence) along the easterly and southerly boundary of the Oil Field.

4. Pursuant to Section 22.24.120.D of the County Code, oil well drilling and oil and gas production is a permitted use in the A-2 zone.

5. The subject area has been used for oil production since the 1920s. The parcels within the subject area are developed with structures for oil field equipment storage, oil and gas production wells, and water injection wells. The subject area also contains offices and other structures for oil field employee usage and a gas plant. The site contains both paved and unpaved roads and parking areas for oil field operations.

6. To date, approximately 1,400 wells have been drilled in the Inglewood Oil Field. Of these, 436 wells are active production wells, 207 are water injection wells, 177 are idled, and 643 wells have been plugged and abandoned.

7. Oil and gas production at the Inglewood Oil Field is presently managed by a single operator, Plains Exploration and Production Company (PXP), through a master lease. The portion of the Inglewood Oil Field located in the Baldwin Hills Zoned District is comprised of 26 parcels, owned by 20 different individuals or entities.

8. Oil production at the Inglewood Oil Field began at a time when the area was largely undeveloped. Today, the Oil Field is surrounded by a mix of single- and multi-family residences, commercial businesses, the Holy Cross Cemetery, the West Los Angeles Community College campus, the Ladera Ball Fields and the Kenneth Hahn State Recreational Area.

9. In January 2006, an unusually large but controlled escape of gas occurred during an oil well drilling operation creating a strong odor that drifted towards residential areas. The incident added to public concerns regarding increased oil field operations and potential conflicts between oil and gas operations and the surrounding residential, institutional, commercial and recreational uses.

10. In response to their community concerns, the Board of Supervisors adopted a series of Interim Urgency Ordinances. These ordinances placed temporary restrictions on oil and gas drilling operations; provided time for staff to study issues related to the compatibility of the oil field and draft recommendations and a program of regulations to address these issues. The operator, Plains Exploration and Production (PXP) abided by these ordinances. The following provides a summary of these ordinances:

Interim Ordinance No.	**Date Adopted**	**Summary of Action**
2006-0050U	June 27, 2006	Placed temporary restrictions on oil and gas drilling operations in the Inglewood oil field.
2006-0064U	August 8, 2006	Extended previous ordinance for a period of ten months and fifteen days to allow staff sufficient time to study and respond to community-expressed issues.
2007-0064U	May 29, 2007	Ordinance extended and amended to temporarily place a moratorium on the drilling of new wells or deepening of existing wells for a period of one year; provide opportunity for the development of permanent regulations for the oil field. Ordinance expired June 26, 2008.

11. In November 2006 the Department of Regional Planning recommended the establishment of a Community Standards District (CSD) to provide enhanced development standards and regulations for the oil and gas operations in the

unincorporated portion of the Inglewood Oil Field that address the unique land use conditions of the area.

12. On March 6, 2007, pursuant to Section 22.44.040 of the County Code, PXP filed an application to establish The Baldwin Hills CSD for the unincorporated portion of the Inglewood Oil Field to address the compatibility concerns associated with operating an oil field in the midst of residential, institutional, commercial and recreational uses.

13. In January 2008, PXP submitted a Draft Baldwin Hills CSD to the DRP for review and environmental analysis.

14. In compliance with the California Environmental Quality Act, a Draft Environmental Impact Report was prepared for the establishment of the Baldwin Hills CSD to provide information about the current and potential future oil and gas production operations; to evaluate the environmental impacts that could result from potential future oil and gas production operations; and to determine if the Baldwin Hills CSD as proposed by PXP has the necessary development standards, operating requirements and procedures to mitigate the potential environmental impacts of potential future oil field development activities.

15. The DEIR, dated June 20, 2008, identified potential impacts that could be associated with the potential future oil field operations as described in the DEIR in the following areas:

    - Safety and Risk of Upset
    - Air Quality
    - Public Health
    - Geological Resources
    - Biological Resources
    - Water Resources
    - Traffic and Circulation
    - Land Use
    - Noise and Vibration
    - Recreation
    - Fire Protection and Emergency Response
    - Cultural Resources
    - Visual Resources and Aesthetics

16. Based on the environmental impact analysis of the potential future oil field development scenario, the DEIR identified a number of mitigation measures to mitigate the potential environmental impacts that could result from future oil field operations. The following is a summary of the impacts, recommended mitigation and determination of potential significances:

    - Safety and Risk of Upset. The DEIR identified mitigation measures to minimize the likelihood of a catastrophic explosion or fires at the oil field due to the storage of butane and natural gas liquids, and to minimize the frequency of oil releases that could

potentially exit the site. Mitigation Measure include: a third-party audit of the existing gas plant and gas liquids storage area to ensure compliance with the Fire Code and American Petroleum Institute publications; blending of butane and heavier gas liquids at the gas plant with crude oil to reduce the amount of butane and heavier gas liquids stored on-site; require 2-hour rated fireproofing and the installation of a water deluge system of the propane and natural gas liquids storage bullets; require a survey of existing retention basins to ensure basins are adequately sited, inspected and maintained to handle a 100-year storm event plus a potential spill for the volume of the largest tank that would drain into that basin; and a survey of existing oil storage tanks to ensure that the tank areas contain sufficient secondary containment to handle at least 110% of the largest tank volume. Impacts would be reduced to less than significance with mitigation.

- Air Quality and Public Health. The DEIR identified mitigation measures to minimize emissions from potential future oil field operations that could impact the public health of surrounding communities associated with the use of diesel engines drill rigs and construction equipment, and potential leaks through the vapor recovery system on the crude oil storage tanks. Mitigations measures include: air quality monitoring at drilling, re-drilling and re-working sites, and at the gas plant; limiting potential future construction of a steam plant and water treatment plant to different schedules to minimize emissions and impacts of fugitive dust; development and implementation of a fugitive dust control plan; require that all drill rig engines be tier 2 or better; require that all off-road construction equipment use tier 3 engines or better; require the use of second generation heavy duty catalysts on all drill rig engines; require the use of a portable flare during drilling operations; require the use of closed systems for all produced water and crude oil associated with production, processing and storage; require the installation of a meteorological station at the oil field; require the use of tank monitors to monitor the vapor space of existing and potential new tank; require the use of odor suppressants when loading material onto the bioremediation farms; and require a 400 foot drilling setback from developed areas. Impacts would be reduced to less than significance with mitigation.

- Geological Resources. The DEIR identified mitigation measure to minimize impacts associated with: potential slope instability due to grading, drilling and production activity; potential seismic hazards due to potential earthquake damage of existing facilities; potential ground movement (subsidence and uplift) due to drilling and enhanced oil recovery. Mitigation measures include: require a site-specific geotechnical investigation for grading in excess of 5,000 cubic yards; require the development and implementation of an erosion control plan that details best management practices prior to new grading; require annual movement monitoring

(subsidence and uplift) of the oil field and its vicinity; require that the operator take appropriate actions as directed by DOGGR if annual ground movement monitoring indicates ground movement is occurring at the oil field; limit the water injection pressures to the limits set by the Division of Oil, Gas and Geothermal Resources (DOGGR); require a fault study for structures that are considered for human habitation in the Alquist-Priolo Fault Zone; prohibit the construction of structures that are considered for human habitation within 50 feet of the active Newport-Inglewood fault; require the installation of an accelerometer at the oil field to determine site-specific ground accelerations and that operations cease following a seismic event measuring 13 percent of gravity until the structural integrity of oil field infrastructure is verified; and require a seismic assessment of all the existing oil tanks. Impacts would be reduced to less than significance with mitigation, except for seismic hazards – the Inglewood Oil Field may be significantly impacted by an earthquake.

- Biological Resources. The DEIR identified mitigation measure to minimize impacts to areas of high quality habitat due to potential grading for well pads and oil spills. Mitigation measures include: the preparation of a Special Status Species Plan that identifies sensitive habitat areas, where impacts should be avoided, and include a method for regular monitoring of the sensitive habitats to ensure habitat protection; the preparation and implementation of a native habitat protection plan to identify measures for restoring areas disturbed by proposed oil field development; require compliance with mitigation ratios for restoration of disturbed areas; and require the revision of the operator's Emergency Response Plan to include measures for protection and clean-up of sensitive biological resources on-site and off-site in the event of an unavoidable disturbance. Impacts would be reduced to less than significance with mitigation.

- Water Resources. The DEIR identified mitigation measures to minimize impacts on existing water resources due to potential oil spills. Mitigation measures include: implementation of a Storm Water Pollution and Prevention Plan; implementation of a Spill Prevention, Control and Countermeasures Plan; require the preparation of a site-specific hydrologic analysis for any new facility that affects the drainage patterns at the site; and require that the site contain adequate drainage basins and that oil storage tank areas contain sufficient secondary containment to contain 110% volume of the largest tank. Impacts would be reduced to less than significance with mitigation.

- Transportation and Circulation: The DEIR determined that project impacts would be less than significant with no mitigation; however, cumulative traffic impacts would be considered significant. The DEIR recommends that the operator contribute to a fair share plan established to finance traffic improvements in the area. The

County currently does not have a fair share plan established for the area. The DEIR recommends that the operator contribute to such plan once it is established. Cumulative traffic impacts would remain significant.

- Land Use. No land use impacts were found. No mitigation measures were proposed.

- Noise Attenuation. The DEIR identified mitigation measures to minimize noise impacts from drilling and production operations. Mitigation measures include: limit drilling noise levels to 5 dBa above the baseline; require the preparation of a drilling quiet mode plan for nighttime drilling activity; require that existing and future well pumps be regularly serviced and repaired to ensure that tonal noise from worn parts does not cause significant tonal noise at the oil field perimeter; require vibration and noise monitoring; require the installation of a new flare at the gas plant to reduce the vibration incidents associated with gas plant flaring; and limit deliveries to the oil field to daylight hours. Impacts would be reduced to less than significance with mitigation.

- Recreation. Recreation impacts associated with future oil field operations relate to potential increases in noise, visual blight and emissions. Impacts to recreation would be minimized by the mitigation measures identified for impacts on noise, visual resources and air quality. Impacts would be reduced to less than significance with mitigation.

- Fire Protection and Emergency Response. The DEIR identified mitigation measures to ensure that the existing facility has the necessary emergency response capabilities and that surrounding communities are notified in the event of an emergency. Mitigation measures include: require a third-party audit of the existing facility's fire fighting capabilities; implementation of audit recommendations; and implementation of a Community Alert Notification System. Impacts would be reduced to less than significance with mitigation.

- Visual Resources and Aesthetics. The DEIR identified mitigation measures to improve the visual character of the oil field. Mitigation measures include: require that the operator landscape the oil field to beautify and screen operations; require that the operator prepare a landscape plan that addresses screening, irrigation and planting protocols for the oil field; and require that new lighting sources be screened and directed to prevent off-site spill over. Impacts would be reduced to less than significance with mitigation.

- Cultural/Historic Resources. The DEIR identified mitigation measures to avoid disturbance to the Cone Trust House and to

unknown subsurface cultural resources from future drilling or construction operations. Mitigation measures include: require that new oil field development be located to avoid disturbance to the Cone Trust House; require that the operator retain a qualified archeologist to prepare training material for construction and drilling personnel; and require that the operator retain a qualified archeologist to prepare a construction treatment plant that would identify treatment and notification procedures in the event that artifacts and/or human remains are discovered at the oil field. Impacts would be reduced to less than significance with mitigation.

17. The DEIR also analyzed the Draft CSD to determine if the development standards, operating requirements and procedures in the Draft CSD as proposed by PXP should be enhanced in order to mitigate potential environmental impacts.

18. In July 2008, the DRP and the EIR consultant held four small-scale neighborhood meetings and two large-scale community meetings to take comments on the Draft CSD, as proposed by PXP, and the Draft EIR.

19. The Regional Planning Commission (RPC) held a series of public hearings concerning the Baldwin Hills CSD and DEIR, two in the community (August 2, 2008 and August 14, 2008) and four downtown (August 27, 2008; September 10, 2008, October 1, 2008 and October 8, 2008). The RPC heard testimony from: the operator in support of the revised CSD; representatives from the County Department of Public Health in support of the DEIR health risk assessment; and members of the public both in support of the CSD, with recommendations for improving the provisions, and in opposition to continued oil operations in the Baldwin Hills.

20. Following the public hearings and numerous meetings with PXP, County Agencies, and interested parties, the DRP, in consultation with the EIR consultant revised the Draft Baldwin Hills CSD to incorporate the mitigation measures identified in the DEIR, and to strengthen provisions to address issues expressed by the community through comments provided at the RPC public hearings and the DRP's outreach efforts.

21. The proposed Baldwin Hills CSD is intended to establish additional regulations, safeguards and controls for activities related to drilling for and production of oil and gas within the unincorporated portion of the Inglewood Oil Field to ensure that oil field operations are conducted in a safe manner and in harmony with adjacent land uses. The mitigation measures identified in the DEIR were incorporated into the proposed CSD to provide the necessary development standards and regulations to minimize potential adverse impacts of oil field operations. Additional provisions were also added to the proposed CSD to address community concerns. The additional provisions include:

- Advisory Committee: Require the establishment of a Community Advisory Panel (CAP), an Ombudsperson and semi-annual meetings.

- Public Agency Coordination: Require the establishment of a Multiple Agency Coordination Committee (MACC) to discuss permitting and enforcement issues concerning the Inglewood Oil Field.

- Air Quality and Public Health: Require air quality monitoring and testing of abandoned wells.

- Emergency Contact and Response: Require annual emergency response drills.

- Monitoring and Enforcement: Impose fines for violations ranging from $1,000 to $10,000 per day per violation.

- Periodic Review: Require that the CSD undergo review every five years.

- Permit Processing: Director's review required for new drilling and production operations for a maximum of 53 wells per year, provided wells have been previously approved as part of an annual drilling plan; Conditional Use Permit required for wells drilled in excess of 53 wells per year, for a steam plant, for water treatment and water softening facilities, for oil heating facilities and the installation of storage tanks with a capacity of 5,000 barrels or greater.

- Community Notification of Oil Field Activity: Require the establishment and maintenance of an Inglewood Oil Field website to provide up-to-date information on oil field activity; Require an annual newsletter; CAP to review and comment on the required annual drilling plans that specify anticipated drilling activity for the following year.

- Permanent Facility Shutdown and Site Cleanup: Establish a production threshold that would trigger a public hearing to determine if shut down of the oil field or other actions are appropriate; Require that the operator submit an Abandonment Plan to DOGGR within 180 days of permanent facility shutdown and submit to the Director a time line for facility removal, site assessment and remediation as necessary.

22. The proposed Baldwin Hills CSD standards and regulations, which include the mitigation measures identified in the DEIR, would ensure that oil field operations are conducted in a safe manner and are compatible with the surrounding uses. The potential impacts associated with potential future oil field operations as described in the DEIR, with the exception of seismic hazard

and cumulative traffic impacts, would be reduced to a level of less than significance with mitigation. A statement of overriding considerations will be prepared for seismic hazard and cumulative traffic impacts.

23. The Final EIR responds to comment on the Draft EIR and has been modified in certain instances in response to those comments. None of the comments on the Draft EIR, the revised information in the Final EIR, nor the comments made at the public hearings resulted in the addition of significant new information to the EIR after public notice of the availability of the Draft EIR.

THEREFORE, BE IT RESOLVED THAT the Regional Planning Commission recommends that the Los Angeles County Board of Supervisors:

1. Hold a public hearing to consider the proposed amendment to Title 22 (Zoning Ordinance) of the Los Angeles County Code relating to establishing the Baldwin Hills Community Standards District (CSD) and to consider the Final Environmental Impact Report for the CSD;

2. Certify the Final Environmental Impact Report;

3. Adopt the attached ordinance establishing the Baldwin Hills CSD, and determine that it is compatible with and supportive of the goals and policies of the Los Angeles County General Plan.

I hereby certify that the foregoing was adopted by a majority of the voting members of the Regional Planning Commission of the County of Los Angeles on October 8, 2008.

By _____
Rosie O. Ruiz, Secretary
Regional Planning Commission
County of Los Angeles

APPROVED AS TO FORM:
OFFICE OF THE COUNTY COUNSEL

By _____
Elaine Lemke, Principal Deputy County Counsel
Property Division

ATTACHMENT 4: RECOMMENDED ORDINANCE FOR BOARD ADOPTION

ORDINANCE No. ____

An Ordinance amending Title 22—Planning and Zoning of the County Code to establish the Baldwin Hills Community Standards District.

The Board of Supervisors of the county of Los Angeles ordains as follows:

SECTION 1:

Section 22.44.110 is hereby amended to read as follows:

22.44.110. List of Districts.

The following community standards district is added by reference, together with all maps and provisions pertaining thereto:

District Number	District Name	Ordinance of Adoption	Date of Adoption
…	…	…	…
33	Baldwin Hills		

SECTION 2.

Section 22.44.14_ is hereby added to read as follows:

A. Intent and Purpose

The Baldwin Hills Community Standards District (CSD) is established to provide a means of implementing regulations, safeguards and controls for activities related to Drilling for and production of Oil and Gas within the Oil Field located in the Baldwin Hills area of the County of Los Angeles. The purpose of these supplemental regulations is to ensure that Oil Field operations are conducted in harmony with adjacent land uses, to minimize the potential adverse impacts of such operations, to regulate such operations so they are compatible with surrounding land uses and to enhance the appearance of the site with landscaping and other property

maintenance requirements. These standards are implemented to protect the comfort, health, safety and general welfare of people living, working and recreating in the surrounding areas.

B. District Boundaries

The boundaries of the District are as shown on the map at the end of this section.

C. Definitions

The terms identified and defined in this subsection C when used in this section shall have the meanings set forth in this subsection, unless the context indicates otherwise. Unless a word or phrase is specifically defined in this subsection, the definitions set forth in the Sections 22.08.010A, et seq., shall apply to this section.

-- “Bioremediation Farm” shall mean the area of land within the Oil Field that is used for soil remediation through petroleum hydrocarbon impacted soil removal efforts.

-- “Breakdown” shall mean any event that results in a violation of applicable SCAQMD rules as specified in SCAQMD Rule 430.

-- “CalARP Program” shall mean the California Accidental Release Prevention Program.

-- “CAP” shall mean the Community Advisory Panel as described in subsection J.1.

-- "Chief Executive Officer" shall mean the Chief Executive Officer for the County of Los Angeles.

-- "Derrick" shall mean any portable framework, tower, mast, or structure which is required or used in connection with Drilling, Redrilling, Reworking, operating, or maintaining a Well for the production of Oil, Gas, or other hydrocarbons from the earth.

-- "Developed area" shall mean:

a. Any lot or parcel of land containing any residential, commercial, industrial or office structure, or used for residential, commercial, industrial or office purposes (provided that no lot or parcel of land on the Oil Field shall be considered to be Developed Area solely because of

the presence thereon of the Cone Trust House or a structure on the Oil Field and used by any Operator for administrative functions associated with the Oil Field); or

b. Any lot or parcel of land containing any public park, house of worship, cemetery, school, or parking lot, or any recreation area which has been developed and opened for public use.

-- “Director” shall mean the director of the Los Angeles County Department of Regional Planning or their designee.

-- “Director of Public Works” shall mean the director of the Los Angeles County Department of Public Works or their designee.

-- “Director of Public Health” shall mean the director of Los Angeles County Department of Health Services or their designee.

-- "District" shall mean the area of land located in the Baldwin Hills and regulated by this section as shown in the map at the end of this section.

-- "DOGGR" shall mean the Division of Oil, Gas, and Geothermal Resources of the Department of Conservation of the State of California.

-- "Drilling" shall mean digging or boring into the earth for the purpose of exploring for, developing, or producing Oil, Gas, or other hydrocarbons, or for the purpose of injecting water, steam or any other Fluid or substance into the earth but does not include remediation efforts to clean-up or remove contamination.

-- "Drilling Equipment" shall mean the Derrick, together with all parts of and appurtenances to such structure and, every piece of apparatus, machinery, or equipment used or erected or maintained for use in connection with Drilling or Redrilling.

-- "Drill Site" shall mean that portion of any land on which Drilling Equipment is placed, stored or utilized during the Drilling, Redrilling or Reworking of a Well.

-- "Enhanced Oil Recovery" shall mean any production method which involves the injection of water, Gas, steam, or any other substance into the earth for the purpose of extracting Oil.

-- “Environmental Compliance Coordinator” shall mean an independent third party approved by the Director and funded by the Operator with expertise in Oil Operations, who shall monitor Oil Operations at the Oil Field to ensure compliance with all provisions of this section.

-- “Emergency Response Plan” or “ERP” shall mean the Emergency Response Plan, which is a plan to handle anticipated emergencies as required by Title 8 of the California Code of Regulations, Section 5192 and the United States Environmental Protection Agency requirements at 40 Code of Federal Regulations 112 or with any emergency response regulations enacted or modified by the State of California or United States Environmental Protection Agency which are applicable to the Oil Field.

-- “EQAP” shall mean the Environmental Quality Assurance Program as described in subsection F.1.

-- “Fire Chief” shall mean the Fire Chief of the County of Los Angeles Fire Department or their designee.

-- “Fire Department” shall mean the County of Los Angeles Fire Department.

-- "Fluids" shall mean any liquid.

-- "Gas" shall mean any substance, either combustible or noncombustible, which is produced in a natural state from the earth and which maintains a gaseous or rarefied state at standard temperature and pressure conditions. It shall also mean the gaseous components or vapors occurring in, or derived from, petroleum or natural gas.

-- “Gas Plant” shall mean the centralized facility that is used for the separation of Gas constituents and removal of impurities. This would include facilities for the removal of hydrogen sulfide, carbon dioxide, depropanizers, debutanizers and other types of fractionation.

-- “Health Department” shall mean the Department of Health Services for the County of Los Angeles.

-- "Idle Well” shall mean any Well that has not produced Oil or Gas or has not been used for injection for six consecutive months of continuous operation during the last five or more years. An Idle Well does not include an active observation Well.

-- "Injection Well" shall mean any Well used for the purpose of injecting water, waste water, brine, hydrocarbons, steam or any other substance as a means of Enhanced Oil Recovery.

-- "Landowner" or “Landowners” shall mean a person, firm, corporation, partnership, or association who owns a legal or equitable title in and to any of the real property located within the Oil Field Portion of the District.

-- "Lessor" means the owner of the land and mineral resources therein subject to a lease.

-- “MACC” shall mean the Multiple Agency Coordination Committee described in subsection G.6.

-- "Maintenance" shall mean and include the diagnosis, repair or replacement of machinery, equipment, apparatus, structure, facility, and parts thereof, used in connection with Oil Operations as well as any other work necessary to reduce public health or safety hazards, other than Drilling, Redrilling or Reworking.

-- “NFPA” shall mean the National Fire Protection Association.

-- “Odor Suppressant” shall mean an organic emulsifier, or other compound, that is used to eliminate hydrocarbon odors by reducing the organic composition of hydrocarbon materials.

-- “Oil” shall mean crude Oil.

-- “Oil Cleaning Plant” shall mean all components of a future facility to be used for the storage and separation of Oil, Gas and water.

-- “Oil Field” or “Oil Field Portion of the District" shall mean the entire District except for the Southern California Edison facility, the Holy Cross Cemetery, and the small non-contiguous parcel located east of La Brea Avenue, all of which excluded areas are shaded on the map at the end of this section.

-- “Oil Operations” shall mean any activity undertaken in connection with the extraction, production, storage or shipping of Oil, Gas or other hydrocarbon substances including but not limited to: Drilling, Redrilling, Reworking, Maintenance, repair, installation, construction operations, Processing, Enhanced Oil Recovery, bioremediation, Well Abandonment, remediation, clean-up, demolition, restoration, and revegetation. The term shall not include purely administrative operations (e.g. work carried on in the administrative office buildings).

-- “Oil Field Web Site” shall mean the web site described in subsection J.2.c.

-- "Operator" shall mean a person, firm, corporation, partnership, or association who owns or holds the right to use the surface of the land to extract Oil and Gas.

-- "Outer Boundary Line" shall mean the exterior limits of the Oil Field Portion of the District.

-- “Permanent Structure” shall mean any building, facility or equipment that is intended to, or does, remain in place on the Oil Field for more than one year, and shall include all Tanks and all components of any Steam Drive Plant, Oil Cleaning Plant or Water Processing Facility. Wells and pipelines shall not be considered Permanent Structures.

-- "Processing" shall mean the use of operations for gauging, recycling, compressor repressuring, injection, dehydration, stimulation, separation (including but not limited to, separation of liquids from Gas), shipping and transportation, and the gathering of Oil, Gas, other hydrocarbon substances, water or any combination thereof.

-- “Pure Tones” shall mean any sound for which the one-third octave band sound-pressure level in the band with the tone exceeds the arithmetic average of the sound-pressure levels of the two contiguous one-third octave bands by five dB for center frequencies of 500 Hertz and above, or by eight dB for center frequencies between 160 and 400 Hertz, or by 15 dB for center frequencies less than or equal to 125 Hertz.

-- “Redrilling” means any drilling operation, conducted to recomplete an existing well in the same or different zone where the well is deeper than the initial well depth.

--”Regional Water Quality Control Board" or "RWQCB" shall mean the Los Angeles Regional Water Quality Control Board that regulates and monitors water quality within the Los Angeles Region.

-- "Reworking" shall mean recompletion of an existing Well and includes operations such as liner replacements, perforating, or fracing. Reworking also includes redrilling a well that is not deepened or sidetracked beyond the existing well bore.

-- “SIMQAP” shall mean the Safety Inspection, Maintenance and Quality Assurance Program described in subsection F.3.

-- "SCAQMD" shall mean the South Coast Air Quality Management District, which is the regional body that regulates and monitors air quality within the four counties of Los Angeles, Orange, San Bernardino and Riverside.

-- “SPCC” shall mean the Spill Prevention, Control and Countermeasure Plan that meets the regulatory requirements of 40 CFR Part 112, or of any subsequently enacted or modified United States Environmental Protection Agency provisions on spill prevention, control and countermeasure plans.

-- “Steam Drive Plant” shall mean all components a potential future centralized facility that would allow for the production of steam to be injected into portions of the Oil Field, including a water treatment plant, water softening facility, and all related Tanks and equipment.

-- "Subsidence" shall mean the settling or sinking of the ground surface.

-- “SWPPP” shall mean the Stormwater Pollution Prevention Plan that meets the requirements specified by the Regional Water Quality Control Board.

-- "Tank" shall mean a container, covered or uncovered, used in conjunction with the Drilling or production of Oil, Gas, or other hydrocarbons for holding or storing Fluids.

-- “Uplift” shall mean the rising or rebound of the ground surface.

-- "Well" shall mean any Oil or Gas Well or any Well drilled for the production of Oil or Gas, or any Well reasonably presumed to contain Oil or Gas, and shall include Injection Wells used for the purpose of Enhanced Oil Recovery or to dispose of fluids associated with the production of Oil and Gas, or an observation Well.

-- "Well Abandonment" shall mean the permanent plugging of a well, in accordance with state law as set forth in Division 3, Chapter 1 of the California Public Resource Code and pursuant to requirements of DOGGR, found in Title 14 of the California Code of Regulations, Section 1723-1723.9 or in accordance with subsequently enacted applicable state laws or regulations regarding Well Abandonment.

-- "Well Servicing" shall mean any Maintenance work performed within any existing Well bore which does not involve Drilling, Redrilling or Reworking.

-- “Water Processing Facility” shall mean all components of a future centralized facility that would be used to treat and store water that is used for injection.

D. Area-Specific Development Standards

1. Operational Limits. No surface Drilling or other surface Oil Operations shall be allowed within the portions of the District consisting of the Southern California Edison facility, the Holy Cross Cemetery, and the small non-contiguous parcel located east of La Brea Avenue. These areas are shaded on the map included at the end of this section.

E. Oil Field Development Standards

The following provisions shall apply throughout the Oil Field Portion of the District.

1. Fire Protection and Emergency Response. The Operator shall comply with the following provisions:

a. Community Alert Notification System (CAN). The Operator shall maintain and test on an annual basis a Community Alert Notification System (CAN) for automatic

notification of area residences and businesses in the event of an emergency arising at the Oil Field that could require residents to take shelter, evacuate, or take other protective actions.

b. Spill Containment Response Training. The Operator shall conduct annual spill containment response training and shall at all times have available, on-site, sufficient and properly maintained equipment and/or facilities so that a spill of the entire contents from the largest Oil Tank on the Oil Field can be responded to and contained in a timely manner to reduce the likelihood that the spill reaches a catch basin.

c. .

2. Air Quality and Public Health. The Operator shall at all times conduct Oil Operations to prevent the unauthorized release, escape or emission of dangerous, hazardous, harmful, noxious, Gases, vapors, odors or substances, and shall comply with the following provisions:

a. Emission Offsets. The Operator shall obtain emission offsets or RECLAIM credits as required by SCAQMD Regulations for all new or modified emission sources that require a new or modified SCAQMD permit.

b. New Gas Plant. No new Gas Plant or flare shall be installed at any Steam Drive Plant that may be constructed on the Oil Field. The Operator shall connect any such Steam Drive Plant to the existing Gas Plant to eliminate the need for a new Gas Plant or flare at the Steam Drive Plant.

c. Odor Minimization. At all times the Operator shall comply with the provisions of an Odor Minimization Plan that has been approved by the Director. The Odor Minimization Plan shall include any measures requested by the Director... The Plan shall provide detailed information about the facility, and shall address all issues relating to odors from Oil Operations. Matters dealt with in the plan shall include setbacks, signs with contact information, logs of odor complaints, method of controlling odors such as flaring and Odor

Suppressants, and the protocol for handling odor complaints. The Odor Minimization Plan shall be reviewed by the Operator on an annual basis to determine if modifications to the Plan are required. Any modifications to the Odor Minimization Plan shall be submitted to the Director for review and approval.

d. Air Monitoring Plan. At all times the Operator shall comply with the provisions of an Air Monitoring Plan that has been approved by the Director. The Air Monitoring Plan shall include any measure requested by the Director. During Drilling, Redrilling, and Reworking operations, the Operator shall monitor for hydrogen sulfide and total hydrocarbon vapors as specified in the approved Plan. Total hydrocarbon vapors shall be monitored at the Gas Plant as specified in the approved Plan. Such monitors shall provide automatic alarms that are triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. For Drilling, Redrilling or Reworking monitors, the alarms shall be audible and/or visible to the person operating the Drilling, Redrilling or Reworking equipment. For the Gas Plant monitors, the alarms shall be audible or visible to the Gas Plant operator. The alarms and actions to be taken shall be as follows:

i. At a hydrogen sulfide concentration of greater than or equal to five parts per million but less than ten parts per million, the Operator will immediately investigate the source of the hydrogen sulfide emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the Drilling, Redrilling or Reworking log. If the concentration is not reduced to less than five parts per million within four hours of the first occurrence of such concentration, the Operator shall shut down the Drilling, Redrilling or Reworking operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated.

ii. At a hydrogen sulfide concentration of greater than or equal to ten parts per million, the Operator shall promptly shut down the Drilling, Redrilling or Reworking

operations in a safe and controlled manner, until the source of the hydrogen sulfide emissions has been eliminated. The corrective action taken shall be documented in the Drilling, Redrilling, or Reworking log. When an alarm is received, the Operator shall promptly notify the County Fire Department – Health Hazardous Materials Division, the Culver City Fire Department, the Office of Emergency Services, and the SCAQMD.

iii. At a total hydrocarbon concentration of greater than or equal to 500 parts per million but less than 1,000 parts per million, the Operator will immediately investigate the source of the hydrocarbon emissions and take prompt corrective action to eliminate the source. The corrective action taken shall be documented in the Drilling log for Drilling Redrilling or Reworking and in the Gas Plant log for the Gas Plant. If the concentration is not reduced to less than 500 parts per million within four hours of the first occurrence of such concentration, the Operator shall shut down the Drilling, Redrilling, Reworking, or Gas Plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated.

iv. At a total hydrocarbon concentration of greater than or equal to 1,000 parts per million, the Operator shall promptly shut down the Drilling, Redrilling, or Reworking or Gas Plant operations in a safe and controlled manner, until the source of the hydrocarbon emissions has been eliminated. The corrective action taken shall be documented in the Drilling log for Drilling, Redrilling or Reworking and in the Gas Plant log for the Gas Plant. When an alarm is received, the Operator shall promptly notify the County Fire Department – Health Hazardous Materials Division, the Culver City Fire Department, and the SCAQMD.

v. All the monitoring equipment shall keep a record of the levels of total hydrocarbons and hydrogen sulfide detected at each of the monitors, which shall be retained for at least five years. The Operator shall, on a quarterly basis, provide a summary of all monitoring events where the hydrogen sulfide concentration was at five parts per million or

higher and the total hydrocarbon concentration was at 500 parts per million or higher to the Fire Chief. At the request of the Fire Chief, the Operator shall make available the retained records from the monitoring equipment.

e. Portable Flare for Drilling. The Operator shall have a gas buster and a portable flare, approved by the SCAQMD, at the Oil Field and available for immediate use to remove any Gas encountered during Drilling operations from Drilling muds prior to the muds being sent to the shaker table, and to direct such Gas to the portable flare for combustion. The portable flare shall accurately and precisely record the volume of Gas that is burned in the flare. The volume of gas burned in the flare shall be documented in the Drilling log. The Operator shall notify the Fire Chief and the SCAQMD within 48 hours in the event a measurable amount of Gas is burned by the flare, and shall specify the volume of Gas that was burned in the flare. No Drilling or Redrilling shall be conducted in areas that are known to penetrate the Nodular Shale zone unless a fully operational and properly maintained gas buster and portable flare are installed on the rig. All other Drilling and Redrilling operations shall be conducted so that any measurable Gas that is encountered can, and will, be retained in the wellbore until the gas buster and portable flare are installed on the rig, after which the Gas will be run through the system. The Operator shall immediately notify the Fire Chief and the SCAQMD in the event any Gas from Drilling or Redrilling operations is released into the atmosphere without being directed to and burned in the flare.

f. Oil Tank Pressure Monitoring and Venting. All Oil Tanks that contain or could contain Oil shall have a fully operational pressure monitoring system that continuously measures and digitally records the pressure in the vapor space of each Tank. The detection system shall notify the Operator via an alarm when the pressure in the Tank gets within ten percent of the Tank relief pressure. In the event of an alarm, the Operator shall immediately take corrective action to reduce the Tank pressure. The corrective action shall be documented

in the Operator's log. The Operator shall notify the Fire Chief and the SCAQMD within 24-hours if the pressure in any Tank covered by this subsection ever exceeds such Tank's relief pressure. Within seven calendar days after any Tank vapor release, the Operator shall report the incident to the SCAQMD as a Breakdown event pursuant to Rule 430, and shall provide the Fire Chief with a written report of the event and the corrective measures undertaken and to be undertaken to avoid future Oil Tank vapor releases. The Operator shall make any changes to such report that may be required to obtain approval from the Fire Chief and the SCAQMD, and shall promptly institute all corrective measures called for by the report.

g. Odor Suppressant for Bioremediation Farms. When loading material or tilling material at the Bioremediation Farms, the Operator shall use an Odor Suppressant such that no odor from the Bioremediation Farms can be detected at the Outer Boundary Line.

h. Odor Suppressant for Drilling and Redrilling Operations. The Operator shall use an Odor Suppressant spray system on the mud shaker tables for all Drilling and Redrilling operations to ensure that no odors from said operations can be detected at the Outer Boundary Line.

i. Closed Systems. The Operator shall ensure all produced water and Oil associated with production, Processing and storage, except those used for sampling only, are contained within closed systems at all times.

j. Meteorological Station. The Operator shall maintain and operate a meteorological station at the Oil Field in good operating condition and in compliance with all applicable EPA and SCAQMD rules, regulations and guidelines, and to the satisfaction of the Director. The Operator shall conduct an audit of the meteorological station on an annual basis and submit the results of the audit to the SCAQMD and the Director. The Operator shall maintain the data files for the meteorological station for a period of not less than ten years. All such data shall be available upon request to the SCAQMD and the Director.

k. Updated Health Risk Assessment. After every five years of operation of the meteorological station, the Operator shall provide the previous five years of metrological data to the SCAQMD and the Director. If the SCAQMD or the Director determines that the previous five years of metrological data from the Oil Field could result in significant changes to the Health Risk Assessment that was conducted as part of the Baldwin Hills Community Standards District Environmental Impact Report, then the County may elect to re-run the health risk assessment using the previous five years of metrological data from the metrological station.

l. Off-Road Diesel Construction Equipment Engines. All off-road diesel construction equipment shall comply with the following provisions.

i. Utilize CARB/EPA Certification Tier III or better certified engines, or other methods approved by the CARB as meeting or exceeding the Tier III standard.

ii. Utilize a California Air Resources Board Verified Level 3 diesel catalyst. The catalyst shall be capable of achieving an 85 percent reduction for diesel particulate matter. Copies of the CARB verification shall be provided to the Director. Said catalysts shall be properly maintained and operational at all times when the off-road diesel construction equipment is in use.

m. Drill Rig Engines. All Drilling, Redrilling, and Reworking rig diesel engines shall comply with the following provisions.

i. Utilize CARB/EPA Certification Tier II or better certified engines, or other methods approved by CARB as meeting or exceeding the Tier II standard.

ii. Utilize second generation heavy duty diesel catalysts capable of achieving 90 percent reductions for hydrocarbons, and for particulate matter smaller than 10 microns. Said catalysts shall be properly maintained and operational at all times when the diesel engines are running.

n. Drilling and Redrilling Setbacks. The following setbacks shall apply within the Oil Field for Drilling or Redrilling.

i. At least 400 feet from Developed Areas.

ii. At least 20 feet from any public roadway.

o. Construction Schedule. To reduce construction air emissions, no overlap shall be permitted in major facility construction and installation activities such as the Steam Drive Plant, the Water Processing Facility, or the Oil Cleaning Plant.

p. Fugitive Dust Control Plan. The Operator shall comply with the provisions of a Fugitive Dust Control Plan that has been approved by the Director. The Plan shall be based upon the requirements of SCAQMD Rule 403 and the SCAQMD CEQA Guideline Fugitive Dust Control Measures. The Fugitive Dust Control Plan shall be reviewed by the Operator every five years to determine if modifications to the Plan are required. Any modifications to the Fugitive Dust Control Plan shall be submitted to the Director for review and approval. The Fugitive Dust Control Plan shall include any measured requested by the Director.

3. Safety and Risk of Upset. The Operator shall at all times conduct Oil Operations in a manner that minimizes risk of accidents and the release of hazardous materials, and shall comply with the following provisions:

a. Natural Gas Liquid Blending. Natural gas liquids at the Gas Plant shall be blended with the Oil to the maximum allowable pipeline system vapor pressure. Natural gas liquids storage shall be limited to the volume allowed in the Risk Management Plan approved by the Fire Department.

b. Propane and Natural Gas Liquids Bullet Fire-Proofing. The Operator shall install and maintain fire-proofing insulation on all propane and natural gas liquids bullets within the Oil Field. The fire-proofing insulation shall have a minimum two-hour fire rating and

otherwise be acceptable to the Fire Chief. All propane and natural gas liquid bullets shall be equipped with an automatic deluge system.

c. Steam Drive Plant Setback. The Steam Drive Plant, if constructed, shall be located at least 1,000 feet from a Developed Area and shall use urea or equivalent, low toxicity material for any nitrogen oxide emission reduction that is required by the SCAQMD.

d. Secondary Containment for Oil. The operator shall comply with the following provisions:

i. The Operator shall ensure that all existing Oil Tank areas in the Oil Field, unless determined by the Director to be infeasible, and all the new Oil Tank areas shall have secondary containment (berms and/or walls) that can contain at least 110 percent of the largest Oil Tank volume to reduce the likelihood of Oil spills entering the retention basins. In the event the Director determines that it would be infeasible to provide 110 percent containment for a particular existing Oil Tank, the Operator shall provide such containment as the Director determines is feasible.

ii. All retention basins in the Oil Field shall be adequately sized, and maintained to handle a 100-year storm event plus a potential spill of the volume of the largest tank that would drain into each basin.

iii. All above ground piping in the Oil Field that contains or could contain Oil shall be protected by basins or secondary containment (berms and/or walls).

4. Geotechnical. The Operator shall comply with the following provisions:

a. Grading. The Operator shall comply with all of the following provisions:

i. All proposed grading shall be subject to prior review and approval by the Director of Public Works.

ii. Grading involving up to 5,000 cubic yards and grading associated with the Bioremediation Farms may be undertaken pursuant to a County Master Grading Plan

stamped by a registered professional engineer and a California-certified engineering geologist and approved by the Director of Public Works.

iii. No slope of cut or fill shall have a gradient steeper than two to one (2:1) unless specifically approved by a site specific geotechnical report.

iv. Cuts and fills shall be minimized to avoid erosion and visual impacts.

b. Geotechnical Investigations. The Operator shall comply with the following provisions:

i. A site-specific geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards, unless associated with the on-site Bioremediation Farms and approved pursuant to a Master Grading Plan approved by the Director of Public Works, and for any grading that supports or impacts a critical facility as determined by the Director. The investigation shall be completed by a California-certified engineering geologist and submitted to the Director and the Director of Public Works for review and approval, in conjunction with an application for a revised grading permit.

ii. A site-specific geotechnical investigation shall be completed for all proposed Permanent Structures. The investigation shall include analysis and recommendations associated with potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California Certified Engineering Geologist and submitted to the Director of Public Works, for review and approval.

c. Erosion Control. The Operator shall comply with the following provisions:

i. The Operator shall comply with all provisions of an Erosion Control Plan that has been approved by the Director. The Erosion Control Plan shall be reviewed by the Operator every two years to determine if modifications to the Plan are required.

Any modifications to the Erosion Control Plan shall be submitted to the Director for review and approval. The Erosion Control Plan shall include any measures requested by the Director.

ii. Erosion shall be controlled on all slopes and banks so that no mud or other substances are washed onto public streets or surrounding property. Such control measures may consist of planting and irrigation, dams, cribbing, riprap, sand bagging, netting, berms, or other devices.

d. Restoration of Slopes. Slopes shall be restored to their original grade once the use that required the grading of the slope has been discontinued. However, if restoration of a slope would negatively affect existing drainage patterns or slope stability, then the slope shall be restored to a grade that avoids these negative effects.

e. Ground Movement Surveys. The Operator shall conduct ground movement surveys once every 12 months, or more frequently if determined necessary by the Director of Public Works, following all provisions of a Ground Movement Monitoring Plan that is acceptable to DOGGR and the Director of Public Works, that calls for both vertical and horizontal ground movement surveys, at specified survey locations within, and in the vicinity of, the Oil Field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations (or any alternative technology specified in the Ground Movement Monitoring Plan approved by the Director of Public Works), and following other survey methods outlined in the Plan. The surveys shall be conducted by a California Licensed Surveyor. The survey results shall be analyzed in relation to Oil Field activities, such as production, steam injection, and waterflooding, taking into consideration individual Oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered Professional Petroleum Engineer, Registered Geotechnical Engineer, and Certified Engineering Geologist. The results of the annual monitoring survey and analysis shall be forwarded to DOGGR and the Director of Public Works. If requested by DOGGR or the

Director of Public Works, the Operator shall make modifications to the Ground Movement Monitoring Plan. In the event that survey indicates that on-going ground movement, equal to or greater than 0.6 inches at any given location, or a lesser value determined by the Director of Public Works, is occurring in an upward or downward direction in the vicinity of or in the Oil Field, the Operator shall review and analyze all claims or complaints of subsidence damage that have been submitted to the Operator or the County by the public or public entity in the 12 months since the last ground movement survey. Based thereon, the Operator shall prepare a report that assesses whether any of the alleged subsidence damage was caused by Oil Operations and submit said report to DOGGR and the Department of Public Works. If the Department of Public Works concurs with any conclusions that the damage was caused by Oil Operations, the Department of Public Works, shall forward the Department of Public Works concerns to DOGGR and ask DOGGR to evaluate the Operator's fluid injection and withdrawal rates to determine whether adjustments to these rates may alleviate the ground movement, and if so, where in the Oil Field such adjustments should be made. The Operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that DOGGR determines are necessary and appropriate to alleviate any ground movement damage. The County shall promptly notify the CAP of any such action that is taken pursuant to this subsection. Injection pressures associated with secondary recovery operations (i.e., water flooding) or disposal of produced fluids shall not exceed reservoir fracture pressures as specified in Title 14 of the California Code of Regulations, Section 1724.10, and as approved by the DOGGR.

f. Construction of Permanent Structures. No Permanent Structures shall be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California-certified engineering geologist. Following the fault study, no Permanent Structures shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the Director of Public Works for review and approval.

g. Oil Field Accelerometer. The Operator shall operate and maintain an accelerometer at the Oil Field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the Oil Field, and transmitted in real-time to the Caltech Seismological Laboratory. The Operator shall cease operations and inspect all Oil Field pipelines, storage Tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the Oil Field of 13 percent of gravity (0.13 g) and promptly notify the Director. The Operator shall not reinstitute operations at the Oil Field and associated pipelines until it can reasonably be determined that all Oil Field infrastructure is structurally sound.

h. Pipeline Management Plan. The Operator shall maintain and implement a Pipeline Management Plan that meets the requirements of DOGGR regulations.

i. Paleontological Monitor. The Operator shall have a qualified paleontologist, approved by the Director, monitor all rough grading and other significant ground disturbing activities in paleontological sensitive sediments. The sensitive sediments that have been identified within the Oil Field include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill or Holocene alluvium.

5. Noise Attenuation. All Oil Operations on the Oil Field shall be conducted in a manner that minimizes noise, and shall comply with the following provisions:

a. Noise Limits. The Operator shall comply with the following provisions:

i. All Oil Operations on the Oil Field shall comply with the noise provisions of Chapter 12.08 of Title 12 of the County Code, with the exception of Drilling, Redrilling, and Reworking, which are exempt from the provisions of said Chapter.

ii. Hourly, A-weighted equivalent noise levels associated with Drilling, Redrilling and Reworking shall not elevate existing baseline levels by more than five dBA at any Developed Area. For daytime activities (7 am to 7 pm) existing baseline noise levels shall be defined as the maximum daytime equivalent noise level (L_{eq}) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. For nighttime activities (7 pm to 7 am), existing baseline noise levels shall be defined as the minimum nighttime equivalent noise level (L_{eq}) at the closest monitoring site as shown in Table 4.9.3 of the 2008 Baldwin Hills Community Standards District Environmental Impact Report. Updated baseline noise levels may be set, and additional monitoring sites may be established, from time to time by the Director. In no case shall baseline noise levels include any Drilling, Redrilling or Reworking operations.

iii. Noise produced by Oil Operations shall include no Pure Tones when measured at a Developed Area.

b. Backup Alarms. Backup alarms on all vehicles operating within the Oil Field shall be disabled between the hours of 8 pm and 8 am. During periods when the backup alarms are disabled, the Operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

c. Quiet Mode Drilling Plan. All Drilling and Redrilling on the Oil Field between the hours of 6 pm and 8 am shall be conducted in conformity with a Quiet Mode Drilling Plan that has been approved by the Director and the Director of Public Health. The Quiet Mode Drilling Plan shall be reviewed by the Operator every year to determine if modifications to the Plan are required. The Operator shall make changes to the Plan if requested by the Director or the Director of Public Health. Any modifications to the Quiet Mode Drilling Plan shall be submitted to the Director and the Director or Public Health for review and approval. The Quiet

Mode Drilling Plan shall include any measures requested by the Director or the Director of Public Health .

d. Equipment Servicing. All noise producing Oil Field Equipment shall be regularly serviced and repaired to minimize increases in Pure Tones and other noise output over time. The Operator shall maintain an equipment service log for all noise producing equipment.

e. Deliveries to the Oil Field. Deliveries to the Oil Field shall not be permitted after 8 pm and before 7 am except in cases of emergency. Deliveries on Sundays or legal holidays shall not be permitted after 8 pm and before 9 am except in cases of emergency.

f. Deliveries within the Oil Field. Deliveries to areas of the Oil Field located within 500 feet of any residential property shall not be permitted after 5 pm or before 7 am except in cases of emergency. Deliveries to such areas on Sundays or legal holidays shall not be permitted after 5 pm and before 9 am, except in cases of emergency.

g. Time Limits for Construction. Construction of Permanent Structures shall not be permitted after 7 pm and before 7 am, or during Saturdays, Sundays, or legal holidays.

h. Construction Equipment. All construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.

i. Construction Equipment Idling. Unnecessary idling of construction equipment internal combustion engines is prohibited.

j. Worker Notification. The Operator shall instruct employees and subcontractors about the noise provisions of subsection E.5 prior to commencement of each and every Drilling, Redrilling, Reworking, and construction operation, and shall annually certify to the Director that such employees and subcontractors have been properly trained to comply

with such noise provisions. The Operator shall prominently post quiet mode policies at every Drilling and Redrilling site.

6. Vibration Reduction. All Oil Operations on the Oil Field shall be conducted in a manner that minimizes vibration. Additionally, vibration levels from Oil Operations at the Oil Field shall not exceed a velocity of 0.25 mm/s over the frequency range 1 to 100 Hz at any Developed Area.

7. Biological Resources. All Oil Operations on the Oil Field shall be conducted in a manner that minimizes impacts to biological resources, and shall comply with the following provisions:

a. Oil Spill Response. The Operator shall comply with all provisions of an Emergency Response Plan that has been approved by the Director, to protect biological species and to revegetate any areas disturbed during an oil spill or clean-up activities. The Operator shall make changes to the Plan if requested by the Director. Any modifications to the Plan shall be submitted to the Director for review and approval. The Emergency Response Plan shall include any measures to protect biological species that may be requested by the Director.

b. Special Status Species and Habitat Protection. The Operator shall comply with all provisions of a Special Status Species and Habitat Protection Plan that has been approved by the Director. The Operator shall make changes to the Plan if requested by the Director. Any modifications to the Plan shall be submitted to the Director for review and approval. The Special Status Species and Habitat Protection Plan shall include any measures requested by the Director.

c. Habitat Restoration and Revegetation Plan. Prior to any disturbance of sensitive natural habitat areas, as identified in the Special Status Species and Habitat Protection Plan, the Operator shall hire a biologist, approved by the County, to conduct a survey of the area to determine if significant impact to sensitive natural habitat, including coastal

sagebrush, coyote bush scrub, riparian scrub, and oak woodland will occur. If the biologist determines that significant impact to sensitive natural habitat will occur, then the Operator shall have a County-approved restoration specialist, with expertise in southern California ecosystems and revegetation techniques, prepare a Habitat Restoration and Revegetation Plan. The Plan shall be submitted to the Director for review and approval. The Director shall make best efforts to complete the review of the Plan as expeditiously as possible, and shall then either approve the plan or provide the Operator with a list of specific items that must be included in the plan prior to approval. No removal of sensitive natural habitat shall occur until the Plan has been approved by the Director. The Habitat Restoration and Revegetation Plan shall include any measures requested by the Director.

d. Pre-Construction Surveys. The following surveys shall be conducted prior to any significant vegetation removal in sensitive natural habitat as identified in the Special Status Species and Habitat Protection Plan.

i. The Operator shall hire a County-approved ecologist/botanist to conduct sensitive plant surveys.

ii. The Operator shall hire a County-approved biologist to conduct sensitive wildlife surveys in habitat areas that could support sensitive wildlife species.

iii. The Operator shall hire a County-approved biologist to conduct breeding and nesting bird surveys if the construction activities would occur during the breeding season (February 1 to August 31 for raptors, and March 15 to September 15 for sensitive/common birds).

iv. The Operator shall hire a County-approved Wetland Delineator to delineate any wetlands that would be affected by construction.

e. Listed Plant or Wildlife Species. If Federal or State listed plant or wildlife species are found, then the Operator shall comply with all applicable United States Fish and Wildlife and California Department of Fish and Game rules and regulation.

f. Construction Monitoring. If the pre-construction surveys find sensitive plant or wildlife species or nesting birds, a biological monitor hired by the Operator, and approved by the County, shall be on site during construction to monitor the construction activities. The biological monitor shall be responsible for the following:

i. Establishing a 300-foot buffer around any active breeding bird nests.

ii. Assuring that vegetation removal does not harm sensitive wildlife species.

iii. Monitoring the construction area for sensitive wildlife species and relocating them to suitable habitat outside of the construction area.

iv. Ensuring that exclusionary fencing is installed around the construction area to prevent sensitive wildlife species from entering the construction area.

g. Tree and Riparian Scrub Removal. Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as possible, for removal outside the nesting season to avoid impacts to nesting birds. If avoidance of removal of trees or riparian scrub during the recommended periods is not possible, a County-approved biologist shall perform a survey to ensure that no nesting birds are present prior to removal. If for any reason a nest must be removed during the nesting season, the Operator shall provide written documentation to the Director demonstrating concurrence from the United States Fish and Wildlife Service and California Department of Fish and Game authorizing the nest relocation and a written report documenting the relocation efforts.

h. Habitat Restoration. Within 60 days of completion of construction activities that have significantly impacted sensitive natural habitat, the Operator shall begin habitat restoration consistent with the approved Native Habitat Restoration and Revegetation Plan discussed in subsection E.7.c. Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The Operator shall replace any significant loss of sensitive natural habitat at the following ratios:

i. 1:1 for each acre of coastal sagebrush or coyote bush scrub.

ii. 2:1 for each acre of riparian scrub or oak woodland.

8. Cultural/Historic Resources. The Operator shall comply with all of the following provisions:

a. Cone Trust House. Oil Operations shall not result in impacts to the Cone Trust House.

b. Archeological Training. The Operator shall provide archeological training for all construction personnel who will be involved with ground disturbance activities at the Oil Field. All such construction personnel shall be required to participate in the training, and will receive training material prepared by a qualified archaeologist, prior to working on ground disturbance activities.

c. Construction Treatment Plan. The Operator shall comply with all provisions of a Construction Treatment Plan, approved by the Director, to ensure that any new archeological discoveries are adequately recorded, evaluated, and, if significant, mitigated. In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist, approved by the

Director. The Construction Treatment Plan shall include any measures requested by the Director.

9. Lighting. Outdoor lighting shall be restricted to only those lights which are required by code for the lighting of building exteriors, Drilling and Redrilling rigs and for safety and security needs. In addition, the Operator shall comply with the following provisions:

a. Screening. All new point lighting sources within the Oil Field shall be screened and directed to confine direct rays to the Oil Field and to prevent off-site spillover lighting effects to the extent feasible.

b. Lighting Plan. A detailed Lighting Plan shall be prepared for each new Permanent Structure and submitted to the Director for review and approval. No work may be commenced on such Permanent Structure until the lighting plan therefor has been approved by the Director. The Lighting Plan shall include any measures requested by the Director.

10. Landscaping, Visual Screening and Irrigation. The Operator shall comply with the following provisions, which are intended to beautify and screen the Oil Field from adjoining residential, recreational, and institutional areas or adjacent public streets or highways:

a. Well Pad Revegetation and Screening Plan. No new Drilling or Redrilling shall be approved by the County until the Operator has prepared and the Director has approved a Well Pad Revegetation and Screening Plan for all Well Pads that will be involved in such Drilling. The Operator shall comply with all provisions of a Well Pad Revegetation and Screening Plan that has been approved by the Director. The Well Pad Revegetation and Screening Plan shall require that, upon completion of the Drilling or Redrilling of a Well, all disturbed or graded terrain surfaces at the Drill Site shall be placed in a clean condition and shall be landscaped with appropriate vegetation to screen the sites from public view to the maximum extent feasible, in compliance with DOGGR requirements, and where emergency

access and fire safety is assured. The Well Pad Revegetation and Screening Plan shall include any elements requested by the Director.

b. Landscape Maintenance. All landscaping on the Oil Field shall be routinely inspected (on at least a monthly basis) and maintained in a neat, clean and healthful condition, including proper watering, pruning, weeding, fertilizing, and replacement of plants as needed. Litter shall also be removed on a regular basis.

11. Oil Field Waste Removal. The Operator shall comply with the following provisions:

a. Waste Collection. All Drilling, Redrilling and Reworking waste shall be collected in portable steel bins compliant with United States Department of Transportation standards. Any Drilling, Redrilling, and Reworking wastes that are not intended to be injected into a Class II Well, as permitted by DOGGR, shall be removed from the Oil Field no later than 30 days following completion of the Drilling, Redrilling and Reworking. This provision does not apply to active sumps and mud pits.

b. Waste Discharge. No Oil Field waste shall be discharged into any sewer, storm drain, irrigation systems, stream, or creek, street, highway, or drainage canal. Nor shall any such wastes be discharged on the ground provided that the foregoing shall not prohibit the proper use of active Drilling sumps and mud pits.

c. Recycling Plan. The Operator shall comply with all provisions of a Recycling Plan that has been approved by the Director. The Recycling Plan shall include any elements requested by the Director.

12. Construction of Private Roads. Roads and other excavations shall be designed, constructed and maintained to provide stability of fill, minimize disfigurement of the landscape, prevent deterioration of vegetation, maintain natural drainage and minimize erosion. Prior to construction of any new road, the Operator shall prepare and submit to the Director of Public

Works for review and approval a Private Road Construction Plan. The Operator shall thereafter comply with all provisions of the approved Private Road Construction Plan. All new private access roads leading off any surfaced public street or highway shall be paved with asphalt or concrete not less than three inches thick for the first 50 feet of said access road from the public street or highway.

13. Signs. All signage shall comply with Part 10 of Chapter 22.52 of Title 22. In addition, the Operator shall comply with the following provisions:

a. Perimeter Identification Signs. Identification signs, at intervals acceptable to the Director, shall be posted and maintained in good condition along the Outer Boundary Line fence and along the fences adjoining the public roads that pass through the Oil Field. Each sign shall prominently display current and reliable emergency contact information that will enable a person to promptly reach, at all times, a representative of the Operator who will have the expertise to assess any potential problem and recommend a corrective course of action. Each sign shall also have the number of the County Department of Regional Planning Zoning Enforcement section and the number of SCAQMD that can be called if odors are detected.

b. Main Entrance Sign. A sign shall be posted and maintained in good condition at the main entrance of the Oil Field prominently displaying a telephone number by which persons may contact a representative of the Operator at all times to register complaints regarding Oil Field operations.

c. Other Required Signs. All identification signs, warning signs, no trespassing signs, and other signs required by County, State and Federal regulations shall be properly posted and maintained in all required locations and in good condition.

d. Well Identification Signs. Well identification signs including the Well name and Well number shall be posted and maintained in good condition at each Well location

e. No Littering Signs. "No littering" signs shall be prominently posted and maintained in good condition on all Oil Field entrance gates.

14. Painting. All Oil Operation related structures visible from public roadways and surrounding properties within the Oil Field shall be painted or otherwise surfaced or textured with a color that is compatible with the surrounding areas, and has been approved by the Director. The painting or other surfacing of all structures covered by this subsection shall thereafter be maintained in good condition.

15. Sumps. The Operator shall comply with all of the following provisions:

a. Sump Clean Out. All sumps that are used, or installed, or maintained for use in connection with any Well, and which have not been used for 90 days for the operation of or the Drilling, Redrilling or Reworking of such Well or any other Well in the vicinity, shall be cleaned out, and all Oil, rotary mud and rubbish removed.

b. Sump Fencing. Around each sump of any depth, there shall be erected and continuously maintained a fence that encloses the sump and complies with the requirements of Sections 11.48.010 -11.48.050, Title 11 of the County Code. This provision shall not apply to sumps that are constantly and immediately attended while Drilling, Redrilling and Reworking operations are proceeding as specified in Section 11.48.020, Title 11 of the County Code.

16. Well Cellars. All cellars shall be constructed in accordance with the most current American Petroleum Institute standards. In addition, the Operator shall comply with the following provisions:

a. Cellar Fluids. Cellars shall be kept free of all Oil, water, or debris at all times. During Drilling, Redrilling and Reworking, the cellar shall be kept free of excess Fluids by a pump which discharges into a waste Tank, mud pit, vacuum truck, or other approved disposal system.

b. Access to Multi-Well Cellars. All multi-Well cellars exceeding three feet in depth and 25 feet in length shall have two means of entrance and exit and an additional exit for every 50 feet in length thereafter. At least one means of entrance or exit for all multi-Well cellars of 25 feet in length shall be a stairway constructed to California Division of Industrial Safety standards.

c. Single Cellar Covers. All single cellars shall be covered with open grating and have no openings larger than three inches at any point. Covers shall be capable of supporting vehicle weight or guardrails shall be erected to prevent vehicle access.

d. Cellar Ladder Openings. All openings for ladders through grating shall be designed to allow exit from underside without obstruction, and shall be kept free of storage of any type. Said opening shall not be less than 24 inches on either side.

17. Stormwater and Drainage Management. The Operator shall comply with the following provisions:

a. Construction Storm Water Pollution Prevention Plan (SWPPP). The Operator shall maintain and implement all provisions of a construction Storm Water Pollution Prevention Plan (SWPPP) that has been inspected by the Regional Water Quality Control Board and the County Department of Public Works. The Operator shall provide the Director and the Director of Public Works with a copy of the SWPPP, and any future modifications, revisions or alterations thereof, or replacements therefor. The SWPPP shall be updated prior to new construction activities as required by the Regional Water Quality Control Board.

b. Spill Prevention, Control and Countermeasure Plan (SPCCP). The Operator shall maintain and implement all provisions of a Spill Prevention, Control and Countermeasure Plan (SPCCP) which meets the requirements of the Local California Unified Program Agency and the United States Environmental Protection Agency. The Operator shall

provide the Director and the Fire Chief with a copy of the SPCCP, and any future modifications, revisions or alterations thereof, or replacements therefor.

c. Hydrological Analysis. A site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site for any new grading that results in the loss of vegetated, sandy, permeable ground areas, which could alter surface runoff at the site. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the County Department of Public Works Hydrology Manual as amended. The hydrological analysis shall be submitted to the Director of Public Works for review and approval. The new grading that required the hydrologic analysis shall not occur until approval of the analysis by the Director of Public Works.

18. Water Management Plan. The Operator shall comply with all provisions of a Water Management Plan that has been approved by the Director and the Director of Public Works. The Plan shall include best management practices, water conservation measures, the use of a drip irrigation system, and shall include provisions for the use of surface water runoff in the retention basins for dust suppression and landscaping. The Plan shall also address the availability of reclaimed water for use at the Oil Field. The Water Management Plan shall be reviewed by the Operator every three years to determine if modifications to the Plan are required. The Operator shall make changes to the Plan if requested by the Director or the Director of Public Works. Any modifications to the Water Management Plan shall be submitted to the Director and the Director of Public Works for review and approval. The Water Management Plan shall include any elements requested by the Director or the Director of Public Works. In addition, the Operator shall comply with the water conservation measures and reporting requirements specified in sections 20.09.020 – 20.09.080, Title 20 of the County Code (Utilities).

19. Groundwater Monitoring. The Operator shall develop, implement, and carry out a groundwater quality monitoring program for the Oil Field that is acceptable to the Director and consistent with all requirements of the Regional Water Quality Control Board. Pursuant to the approved program, the Operator shall install and maintain groundwater monitoring Wells in the vicinity of each surface water retention basin, which is permitted by the Regional Water Quality Control Board. Such monitoring Wells shall be completed to the base of the permeable, potentially water-bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pico Formation, as determined by a California Certified Professional Geologist. The Regional Water Quality Control Board and the Director shall be regularly advised of the results of such monitoring, and shall be immediately advised if such monitoring indicates a potential problem.

20. Fencing. All portions of the Oil Field on which Oil Operations are conducted shall be enclosed with a fence compliant with DOGGR regulations codified at California Code of Regulations Title 14, Article 3, Sections 1778 and 1779, or as may be subsequently amended by the State.

21. Storage of Equipment. The Operator shall comply with all provisions of an Equipment Storage Site Plan that has been approved by the Director. The Equipment Storage Site Plan shall include any measures requested by the Director. The Operator shall deliver to the Director for review and approval an updated Equipment Storage Site Plan when changes are proposed to the equipment storage areas at the Oil Field. Changes to the equipment storage areas shall not be made until the updated plan has been approved by the Director. Unless indicated otherwise in this subsection, all outside storage of parts or equipment shall comply with Part 7 of Chapter 22.52 of the County Code. There shall be no storage at the Oil Field of material, equipment, machinery or vehicles which are not essential to the Oil

Operations. All non-essential equipment shall be removed from the Oil Field within 30 days of the date they become non-essential, unless a time extension is granted by the Director.

22. Oil Field Cleanup and Maintenance. The Operator shall maintain the site in a clean and orderly condition and shall comply with the following provisions:

a. Equipment Removal. All facilities that have reached the end of their useful economic life shall be properly decommissioned and removed from the Oil Field within one year. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use, unless such restoration and revegetation would interfere with fire safety or access to Oil Operations.

b. Equipment Maintenance. All equipment, improvements, facilities and other personal property or fixtures located on the Oil Field, shall be maintained in good condition to the satisfaction of the Director and the Director of Public Works.

c. Site Debris and Vegetation. The Operator shall keep the property free of debris and vegetation overgrowth to the satisfaction of the Director.

23. Security. All unmanned entrances to the Oil Field shall be equipped with sliding gates which shall be kept closed at all times except when authorized vehicles are entering or leaving the Oil Field. The Operator shall have a security guard on duty 24 hours per day.

24. Vehicle Parking. Vehicular parking shall comply with Part 11 of Chapter 22.52 of County Code.

25. Sanitation. The Operator shall comply with the following provisions:

a. Garbage and Refuse. The Oil Field shall be maintained in a clean, sanitary condition, free from accumulations of garbage, refuse and other wastes.

b. Toilets and Wash Facilities. Sanitary toilet and washing facilities shall be installed at any site where personnel are permanently stationed. Portable facilities shall be

provided wherever crews are temporarily employed. Such facilities shall be maintained in a clean and sanitary condition at all times.

26. Storage of Hazardous Materials. The Operator shall comply with all provisions of a Hazardous Materials Business Plan that has been submitted to the Fire Chief. The Operator shall deliver to the Fire Chief for review and approval an updated Hazardous Material Business Plan on an annual basis. This Plan shall provide the location of where hazardous materials are stored at the Oil Field. Hazardous materials shall be stored in an organized and orderly manner, and identified as may be necessary to aid in preventing accidents, and shall be reasonably protected from sources of external corrosion or damage to the satisfaction of the Fire Chief.

27. Drilling, Redrilling and Reworking Operations. The Operator shall comply with all of the following provisions:

a. DOGGR Regulations. All DOGGR regulations related to Drilling, Redrilling and Reworking operations.

b. Number of Drilling and Redrilling Rigs. No more than three Drilling or Redrilling rigs shall be present within the Oil Field at any one time.

c. Annual Drilling, Redrilling, Well Abandonment and Well Pad Restoration Plan. Before the end of each calendar year, the Operator shall develop and deliver to the Director an Annual Drilling, Redrilling, Well Abandonment and Well Pad Restoration Plan, which shall describe all Drilling, Redrilling, Well Abandonment, and Well pad restoration activities that may be conducted during the upcoming calendar year. The Operator may at any time submit to the Director proposed amendments to the then current Annual Plan. No Drilling, Redrilling or Abandonment activity may be commenced unless it is described in a current Annual Plan (or an amendment thereto) which has been approved by the Director. The Annual Plan (and any amendments) shall be provided to the CAP for review and comment. All comments on the Annual Plan from the CAP shall be submitted to the Director in writing, and, if timely submitted,

will be considered as part of the Director's review and approval. The Director shall complete the review of the Annual Plan (and any amendments) within 45 days of receipt, and shall either approve the Annual Plan or provide the Operator with a list of deficiencies. The Annual Plan shall comply with the provisions of this subsection, and shall include the following:

i. The maximum number of Wells proposed to be Drilled or Redrilled;

ii. Approximate location of all Wells proposed to be Drilled or Redrilled;

iii. Approximate location of all proposed new Well pads, including their size and dimensions;

iv. Estimated target depth of all proposed Wells and their estimated bottom hole locations;

v. A discussion of the steps that have been taken to maximize use of existing Well pads, maximize use of Redrilled Wells, and maximize the consolidation of Wells;

vi. Location of all proposed Well Abandonments, if known in accordance with DOGGR integrity testing program of Idle Wells;

vii. Location of all Well pads proposed to be abandoned and restored;

viii. A proposed schedule and phasing of the Drilling, Redrilling, Well Abandonment, Well pad abandonment and restoration activities;

ix. A discussion of the latest equipment and techniques that are proposed for use as part of the Drilling and Redrilling program to reduce environmental impacts; and

x. A topographic vertical profile showing proposed location of new Wells that reflects local terrain conditions and that addresses the potential visibility of existing and proposed Wells and other production facilities from residential and recreation areas.

d. Drill Rig Engines. All engines used for Drilling and Redrilling operations shall be operated by muffled internal-combustion engines or by electric motors.

e. Fire Safety Regulations. All Drilling, Redrilling and Reworking shall be in conformance with applicable fire and safety regulations.

f. New Technology. Proven reasonable and feasible technological improvements which are capable of reducing the environmental impacts of Drilling and Redrilling shall be considered as they become, from time to time, available.

g. Derricks and Portable Masts. All Derricks and portable masts used for Drilling, Redrilling and Reworking shall meet the standards and specifications of the American Petroleum Institute as they presently exist or as may be amended.

h. Equipment Removal. All Drilling and Redrilling equipment shall be removed from the site within 90 days following the completion of Drilling or Redrilling activities unless the equipment is to be used at the Oil Field within five days for Drilling or Redrilling operations.

i. Drill Site Conditions. All Drilling Sites shall be maintained in a neat and orderly fashion.

j. Belt Guards. Belt guards shall be required over all drive belts on Drilling, Redrilling and Reworking equipment. Guarding shall be as required by, Title 8 of the California Code of Regulations, Section 6622, or as may be subsequently amended.

28. Processing Operations. The Operator shall comply with the following provisions:

a. Limits on Processing Operations. Unless otherwise expressly required by DOGGR, the only Processing operations permitted at the Well Site shall be: the dehydration of Oil and Gas produced from the Well; the storage, handling, recycling and transportation of such materials; and those Processing operations required for water injection purposes.

b. Refining. No refining shall be conducted within the Oil Field.

c. Well Pump Motors. All Well pumping units shall be operated by electric motors.

d. Well Pumps. Downhole submersible pumps and low-profile pumping units for production Wells must be used wherever feasible.

e. Removal by Pipeline Only. All Oil, Gas and other hydrocarbons, produced from any Well in the Oil Field shall be shipped and transported through pipelines, except in case of an emergency or when access to a pipeline becomes unavailable. Excluded from this requirement are propane and other related natural gas liquids that are in amounts in excess of what can be blended into the pipeline. Should any pipeline through which Oil or Gas is currently transported become unavailable for the safe transportation of said products due to maintenance problems with the pipeline, or lack of sufficient capacity within the pipeline to handle the volume of Oil and Gas needing transportation, or because the owner or operator of such pipeline elects to discontinue transporting Oil or Gas through such pipeline, then the Operator shall within 180 days of the date the existing pipeline becomes unavailable, seek to acquire a private right of way or easement, or shall file an application for a right of way, easement, encroachment permit or franchise for the construction of a replacement pipeline and shall diligently prosecute such application until such pipeline is completed. During any emergency situation, or during such time as any existing pipeline becomes unsafe or unavailable, Oil and Gas may be transported by truck until the emergency situation is resolved or until a replacement pipeline shall be permitted and constructed in accord with all applicable laws and regulations.

f. Pipelines. The Operator shall comply with the following provisions:

i. New pipelines that remove Oil or Gas from the Oil Field shall be buried below the surface of the ground;

ii. All pipelines which are not enclosed within a fence shall be placed underground or covered with materials approved by the Fire Chief. Said covers shall be maintained in a neat, orderly, secure manner;

iii. Any and all water or brine produced during pipeline construction shall either be injected in accordance with DOGGR requirements, or disposed of in accordance with other local, State or Federal regulations;

iv. New pipeline corridors shall be consolidated with existing pipelines or electrical transmission corridors where feasible; and

v. Upon completion of pipeline construction, the site shall be restored to the approximate previous grade and condition.

g. Active Pipeline Plot Plan. The Operator shall submit to the Fire Chief a plot plan depicting the approximate location of all active pipelines regulated by the United States Department of Transportation or California State Fire Marshall owned by the Operator that are located outside the Outer Boundary Line, including waste water, and trunk and gathering lines to transport Oil or petroleum products. The plot plan shall be submitted within 30 days of the installation of any new pipelines or the relocation of an existing pipeline.

h. Machinery Enclosures. The Operator shall maintain enclosures around machinery with moving parts consisting of a fence, screening or housing. Said enclosures shall be installed in compliance with Section 11.16.020, Title 11 of the County Code.

i. Opening Protections. The Operator shall cap, close or protect the openings in all Oil Wells, test holes and similar excavation in compliance with Section 11.54.010, Tile 11, of the County Code.

29. Well Reworking Operations. The Operator shall comply with the following provisions:

a. DOGGR Regulations. The Operator shall comply with all DOGGR regulations related to Well Reworking operations.

b. Number of Reworking Rigs. No more than eight Reworking rigs shall be present within the Oil Field at any one time, unless an emergency condition requires additional

Reworking rigs. This does not include equipment used for Well Maintenance or Well Abandonment.

c. Hours of Operation. With exception of emergencies, Well Reworking operations shall not be allowed after 7 pm or before 7 am, nor on Sundays or legal holidays.

d. Specifications. Reworking rigs shall meet the standards and specifications of the American Petroleum Institute.

e. Equipment Removal. Reworking rigs shall be removed from the Oil Field within seven days following the completion of Reworking operations unless such rig will be used on another Well at the Oil Field within five days.

30. Tanks. The Operator shall comply with the following provisions:

a. New Tank Specifications. All new Tanks and appurtenances shall be designed, constructed, installed and maintained in accordance with current County Fire Code, American Petroleum Institute, DOGGR, California Division of Industrial Safety, and Environmental Protection Agency Standards, applicable provisions of Title 14 of the California Code of Regulations Section 1774, and applicable CalARP Program requirements.

b. Setbacks. No new storage Tank, excluding a replacement Tank, shall be constructed closer than 500 feet from any Developed Area, or closer than 200 feet from a public road. No building shall be constructed within 50 feet of any Oil storage Tank.

c. Vapor Recovery. Oil, Wash, and Produced Water Tanks shall be vapor tight and shall be equipped with a vapor recovery system.

d. Specifications for New Tank Piping, Valves, Fittings and Connections. All new Tank piping, valves, fittings and connections including normal and emergency relief venting, shall be installed and maintained in accordance with current American Petroleum Institute standards to the satisfaction of SCAQMD and DOGGR.

e. Detection of Tank Bottom Leaks. The Operator shall design, implement and comply with a program, approved by the Fire Chief, for controlling and detecting Tank bottom leaks on all Tanks at the Oil Field. The Operator may use a combination of methods including but not limited to diversion walls, dikes, Tank foundations of concrete or gravel and, a Tank bottom leak detection system in compliance with Title 14 of the California Code and Regulations Section 1773, or any subsequently enacted State regulations regarding tank bottom leaks.

31. Well and Production Reporting. The Operator shall deliver annual production reports to the Director and the Fire Chief. The reports shall provide the following information:

a. A copy of all DOGGR Forms110 and 110B submitted during the previous 12 months.

b. Number and mapped location of Wells Drilled or Redrilled, including Well identification numbers.

c. Number and mapped location of water injection Wells, including Well identification numbers.

d. Number and mapped location of Idled Wells, including Well identification numbers and the date each Well was idled.

e. Number and mapped location of Abandoned Wells, including date each Well was Abandoned and/or re-abandoned.

f. Any additional information requested by the Director or the Fire Chief.

32. Idle Well Testing and Maintenance. The Operator shall comply with Title 14 of the California Code of Regulations Section 1723.9 regarding testing and Maintenance of Idle Wells, or any subsequently enacted State regulations regarding testing and Maintenance of Idle Wells. The Operator shall carry out all additional tests, remedial operations and mitigation measures required by DOGGR if any Idle Wells do not meet the test standards.

33. Abandoned Well Testing. The Operator shall conduct annual hydrocarbon vapor testing of areas within the Oil Field that contain Abandoned Wells. The testing shall be done using a soil Gas vapor probe, or another method approved by the Director. The results of the testing shall be submitted to the Director and DOGGR on an annual basis. Abandoned Wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the Director and DOGGR within 24 hours of the Abandoned Well Test. If directed by DOGGR, the Operator shall re-abandon the Well in accordance with DOGGR rules and regulations. If the test results for an Abandoned Well area is at or below the background levels for two consecutive years that area shall thereafter be tested every five years.

34. Well and Well Pad Abandonment. If DOGGR orders the Operator to plug and abandon any Wells on the Oil Field, the Operator shall deliver to the Fire Department, on a timely basis, all Notices of Intent to Plug and Abandon a Well that the Operator files with DOGGR and shall commence promptly and proceed diligently with the plugging and abandonment operations in accordance with DOGGR rules and regulations and the terms of the DOGGR permit to plug and abandon the Well. Well Abandonment may commence once all necessary permits and approvals are obtained. If the Well pad associated with the Abandoned Well does not contain other production, injection or Idle Wells, and will not be used for future Drilling, then the Operator shall promptly abandon the Well pad consistent with the following provisions:

a. Closure of Sumps. The Operator shall clean out all sumps, cellars and ditches and level and fill all sumps and depressions pursuant to DOGGR requirements. If sumps are lined with concrete, bottoms and walls shall be broken up and removed. Sumps shall be closed in accordance with Regional Water Quality Control Board and California Department of Toxic Substances Control requirements.

b. Well Pad Site Cleanup. The Operator shall leave the site entirely free of Oil, rotary mud, Oil soaked earth, asphalt, tar, concrete, litter, debris and other substances to the satisfaction of DOGGR and in accordance with federal requirements.

c. Contaminated Materials. All contaminated soils and materials within the Well pad boundaries shall be removed and treated or disposed of in accordance with all local, County, State, and Federal regulations.

d. Well Pad Revegetation. The Well pad shall be revegetated following the requirement of the Native Habitat Restoration Plan.

35. County Request for Review of Well Status. The Director may periodically review the status of the Operator's Wells and submit to DOGGR a list of Wells the Director believes should be plugged and abandoned as specified in Public Resources Code Section 3206.5 or any subsequently enacted State Law related to a local jurisdiction's right to request State-agency review of Idle Wells.

36. Reduced Throughput Triggering Review. When Oil or Gas throughput is less than 2,000 barrels per day, the Director shall conduct a public hearing to determine if shut down of the Oil Field or other actions are appropriate.

37. Abandonment Procedures. Within 180 days of permanent facility shut down, the Operator shall submit an Abandonment Plan to DOGGR and submit to the Director for review and approval a time line for facility removal, site assessment and remediation as necessary. The Operator shall begin abandonment of the site no later than 20 days after the Director's approval of the timeline, and shall provide to the Director quarterly updates on the abandonment process until such time as the Oil Field is abandoned and remediated. The Operator and Landowners shall post a performance bond to insure compliance with all provisions of this subsection, and shall continue to pay property taxes at the rates assessed during Oil Field operation until all site restoration work has been fully completed, as determined by the Director.

F. Monitoring and Compliance

1. Environmental Quality Assurance Program (EQAP). The Operator shall comply with all provisions of an Environmental Quality Assurance Program (EQAP) that has been approved by the Director. The following provisions relate to the EQAP:

a. EQAP Requirements. The EQAP shall provide a detailed description of the steps the Operator shall take to assure compliance with all provisions of this section, including but not limited to all of the monitoring programs called for by this section.

b. Annual EQAP Reports. Within 60 days of the end of each calendar year, the Operator shall submit to the Director an annual EQAP report that reviews the Operator's compliance with the provisions of the EQAP over the previous year and addresses such other matters as may be requested by the Director. The Annual EQAP Report shall include the following:

i. A complete list and description of any and all instances where the provisions of the EQAP, or any of the monitoring programs referred to therein or in this section, were not fully and timely complied with, and an analysis how compliance with such provisions can be improved over the coming year.

ii. Results and analyses of all data collection efforts conducted by the Operator over the previous year pursuant to the provisions of this section.

c. EQAP Updates. The EQAP shall be updated as necessary and submitted to the Director for approval along with the annual EQAP report. The EQAP updates shall be provided to the CAP and MACC for review and comment. Comments from the CAP and MACC, if timely received, shall be considered by the Director before making a decision to approve the same. The Director shall complete the review of EQAP updates as soon as practicable, and shall either approve the updated EQAP or provide the Operator with a list of specific items that must be included in the EQAP prior to approval. The Operator shall respond

to any request for additional information within 30 days of receiving such request from the Director, unless extended by the Director.

2. Environmental Compliance Coordinator. The Operator shall recommend and fund the Environmental Compliance Coordinators. The number of Environmental Compliance Coordinators shall be determined by the County and shall take into account the level of Oil Operations at the Oil Field. The Environmental Compliance Coordinator(s) shall be approved by, and shall report to, the Director. The responsibilities of the Environmental Compliance Coordinator(s) shall be set forth in implementation guidelines that may be developed by the County for the Oil Field and shall generally include:

a. On-site, day-to-day monitoring of construction or Drilling and Redrilling activities as determined by the Director.

b. Taking steps to ensure that the Operator, and all employees, contractors and other persons working in the Oil Field, have knowledge of, and are in compliance with all applicable provisions of this section.

c. Evaluating the adequacy of Drilling, Redrilling, and construction impact mitigations, and proposing improvements to the Operator or contractors, and the County.

d. Reporting responsibilities to the various County agencies with oversight responsibility at the Oil Field, as well as other agencies such as DOGGR, and SCAQMD.

3. Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP). The Operator shall comply with all provisions of a Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) that has been approved by the Director and the Fire Chief.

a. SIMQAP Requirements. The SIMQAP shall, at a minimum provide for:

i. Inspection of construction techniques;

ii. Regular maintenance and safety inspections;

iii. Periodic safety audits;

iv. Corrosion monitoring and leak detection; and

v. Inspections of all trucks carrying hazardous and/or flammable material prior to loading.

b. SIMQAP Updates. The Operator shall periodically review and revise the SIMAQP to incorporate changes in procedures, and new safety and maintenance technologies and procedures. The Operator shall make such revisions at least every five years, or more frequently, if the Operator determines changes are necessary or if requested by the Director or the Fire Chief. The Operator shall submit SIMQAP updates to the Director and the Fire Chief for their review and approval. The Director shall complete the review of SIMQAP updates as soon as practicable, and shall either approve the updated SIMQAP or provide the Operator with a list of specific items that must be included in the SIMQAP prior to approval. The Operator shall respond to any request for additional information within 30 days of receiving such request from the Director, unless extended by the Director.

c. Worker Notification. The Operator shall ensure that all persons working on the Oil Field comply with all provisions of the currently approved SIMQAP.

d. Inspections. The SIMQAP shall provide for involvement of the County staff or the Environmental Compliance Coordinator in all inspections required by this section.

4. Compliance Audits. Every five years (or more frequently if so requested by the Director), the Operator shall conduct a comprehensive third-party Compliance Audit of the Oil Field to ensure compliance with all applicable federal, state and local environmental, health and safety laws, rules, and regulations. The third-party auditor shall be subject to prior approval by the Director. The results of the Compliance Audit together with a corrective action plan for any non-compliance items found in the audit shall be submitted to the Director. If any of the non-compliance items are related to DOGGR requirements, then the Director shall notify DOGGR. The corrective action plan shall identify the non-compliance item, describe the corrective action

to be taken, and provide the deadline for completing each element listed in the corrective action plan. The Operator shall be in violation of the provisions of this subsection if the Operator fails to complete any corrective action called for by the corrective action plan within the approved time limits specified in the Plan, unless extended by the Director. The Operator shall submit to the Director quarterly updates on the corrective action plan until such time as all corrective actions have been completed.

5. Annual Emergency Response Drills of the County and Culver City Fire Departments. The Operator shall demonstrate the effectiveness of the Emergency Response Plan by responding to one planned emergency response drill per year which shall be conducted in conjunction with the County and Culver City Fire Departments. Emergency response drills required by other agencies that involve County and Culver City Fire can be used to satisfy this provision. In addition, the Operator shall demonstrate the effectiveness of the Emergency Response Plan by responding to not more than two unannounced drills each year which may be called by the County Fire Department at the Oil Field. If critical operations are then underway at the Oil Field, the Operator need not respond to a unannounced drill to the extent such a response would, as a result of such critical operations, create an undue risk of personal injury or property damage, but in such case the Operator must promptly explain the nature of the critical operations, why response is not possible, and when the critical operations will be completed.

6. Noise Monitoring. The Health Department shall retain an independent qualified acoustical engineer to monitor ambient noise levels in the areas surrounding the Oil Field as determined necessary by the Director or the Director of Public Health. The monitoring shall be conducted unannounced and within a time frame specified by the Director or the Director of Public Health. Should noise from the Oil Operations exceed the noise thresholds specified in this section, no new Drilling, or Redrilling permits shall be issued by the County until the

Operator in consultation with the Director and Director of Public Health identifies the source of the noise and the Operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the Oil Field Web site and provided to the CAP.

7. Vibration Monitoring. The Health Department shall retain an independent qualified acoustical engineer to monitor vibration in the areas surrounding the Oil Field as determined necessary by the Director or the Director of Public Health. The monitoring shall be conducted unannounced and within a time frame specified by the Director or the Director of Public Health. Should vibration from the Oil Operations exceed the vibration thresholds specified in this section, no new Drilling or Redrilling permits shall be issued by the County until the Operator in consultation with the Director and Director of Public Health identifies the source of the vibration and the Operator takes the steps necessary to assure compliance with thresholds specified in this section. The results of all such monitoring shall be promptly posted on the Oil Field Web site and provided to the CAP.

8. Complaints. All complaints related to Oil Operations received by the Operator shall be reported on the same business day to the Environmental Compliance Coordinator and to the Director. Depending upon the nature of the complaint, the Operator shall report the complaint to the SCAQMD, DOGGR, and any other appropriate agencies with oversight authority regarding the complaint at issue. If the complaint is received after normal business hours, it shall be reported to the Environmental Compliance Coordinator and the agencies at the opening of the next business day.

G. Administrative Items

1. Costs of Implementing Monitoring and Enforcing Conditions. The Operator shall be fully responsible for all reasonable costs and expenses incurred by the County, or any County contractors, consultants or employees, in implementing, monitoring or enforcing this

section, including but not limited to costs for permitting, permit condition implementation, mitigation monitoring, reviewing and verifying information contained in reports, undertaking studies, research and inspections, administrative support, and including the fully burdened cost of time spent by County employees on such matters.

2. Draw-Down Account. The Operator shall maintain a draw-down account with the County Department of Regional Planning, from which actual costs will be billed and deducted for the purpose of defraying the expenses involved in the County's review and verification of the information contained in any required reports and any other activities of the County, including but not limited to: enforcement, permitting, inspection, coordination of compliance monitoring, administrative support, technical studies, and the hiring of independent consultants. The initial amount to be deposited by the Operator shall be $500,000. In the first year, if withdrawals from the account have reduced its balance to less than 50 percent of the amount of the initial deposit ($250,000), the Operator shall deposit $50,000 in supplemental funds within 30 business days of notification. After the first year, if the balance in the drawdown account is reduced at any time to $50,000, the Operator shall deposit $50,000 in supplemental funds on each occasion that the account is reduced to $50,000 or less within 30 business days of notification. There is no limit to the number of supplemental deposits that may be required. At the discretion of the Operator, the amount of an initial or supplemental deposit may exceed the minimum amounts specified in this subsection. The Director may, from time to time, increase the minimum $50,000 figure to account for inflation or the County's experience in obtaining funds from the account.

3. Indemnification. The Operator shall enter into an agreement with the County to indemnify and hold harmless the County, its elected and appointed officials, agents, officers and employees from any claim, action or proceeding for damages arising from its Oil Operations, including water, air or soil contamination, health impacts, or loss of property value during the Oil

Operations, Well Abandonment and post-abandonment activities with terms approved by, and in a form acceptable to, the CEO.

4. Insurance Requirements. Within 90 days of the effective date of this section or such time as may be extended by the Director for good cause shown, and without limiting the Operator's indemnification of the County as required in the preceding subsection, the Operator shall provide evidence of insurance coverage that meets County requirements as required and approved by the CEO. Such coverage shall be maintained so long as Oil Operations are conducted within the District and until such time as all Abandonment requirements are met and certified by the appropriate local, state, and federal agencies. Such insurance coverage shall include but is not necessarily limited to the following: general liability, auto liability; professional liability; and environmental impairment liability coverage insuring clean-up costs, and endorsing for 'Sudden and Accidental' contamination or pollution. Such coverage shall be in an amount sufficient to meet all applicable state and federal requirements, with no special limitations. At the Operator's request and only with County approval by the CEO, the Operator may self-insure all or any part of the above coverage obligations in lieu of purchasing commercial coverage. These insurance requirements shall be in addition to all other indemnification, insurance and performance security required by federal, state and local regulations and permits.

5. Performance Security. The Operator shall be subject to the following provisions:

a. Performance Bond. Prior to issuance of the first Drilling or Redrilling permit pursuant to this section, the Operator shall provide to the County Department of Regional Planning, a faithful performance bond or financial instrument in the sum to be determined by the CEO, payable to the County and executed by a corporate surety acceptable to the County and licensed to transact business as a surety in the State of California. Such bond shall be conditioned upon the faithful performance by Operator of duties related to Well Abandonment,

site restoration and environmental cleanup and shall be in a format and include terms approved by the CEO.

b. Change of Operator. The performance bond shall continue in force for one year following any sale, transfer, assignment, or other change of Operator of the Oil Field, or of the current Operator's termination of activities at the Oil Field. The County may release said bond prior to the end of the one year period upon satisfaction by the Operator of all its obligations. Notwithstanding the foregoing, the performance bond shall not be terminated or released upon the sale, transfer, assignment or other change of Operator until the new Operator has delivered a replacement bond complying with the provisions of this subsection G.

c. Funding Options. At its sole option, the County may accept Certificates of Deposit, Cash Deposits, or U.S. Government Securities in lieu of commercial bonds to meet the above bonding requirements on terms approved by the CEO.

6. Other Obligations. The insurance, indemnification and performance security requirements in subsections G.3, G.4 and G.5 shall be in addition to all other indemnification, insurance and performance security required by federal, state and local regulations and permits.

7. Periodic Review. The County shall conduct a comprehensive review of the provisions of this section at least every five years to determine if the provisions of this section are adequately protecting the health, safety and general welfare. Such reviews shall, among other things, consider whether additional provisions should be added, appended or removed. One of the main goals of the periodic review shall be to evaluate if proven technological advances that would further reduce impacts of Oil Operations on neighboring land uses should be incorporated into the provisions of this section.

a. Review Requirements. Each review shall include a report by a hearing officer designated by the Director, which shall be prepared after public notice and an opportunity for public comment. The report shall include a comprehensive analysis of the effectiveness of

this section, and shall review and consider enforcement activity, operational records, and any other issues relating to Oil Operations. A draft of the report shall be provided to the CAP and the Operator for review and comment. All comments on the draft report from the CAP and the Operator shall be submitted to the hearing officer in writing, and will be considered, if timely received, before the report is finalized. The final report by the hearing officer shall include a recommendation as to whether the Director should prepare proposed amendment to this section for submission to the Board of Supervisors.

b. Early Reviews. At the discretion of the Director, reviews of this section may be conducted more frequently than every five years. Without limiting such discretion, the Director shall consider whether an early review should be undertaken if more than three material violations occur within any twelve month period.

8. Multiple Agency Coordination Committee (MACC). A MACC shall be established to coordinate activities and communications between the various agencies with regulatory authority over the Oil Operations within the District. While each agency will continue to make its own decisions with regard to their respective areas of authority, the MACC will allow for collection and analysis of data and for discussion of both strategic evaluations and enforcement actions taken by the various agencies at the Oil Field.

a. MACC Members. The Director shall establish a MACC that includes representatives from the following agencies: the County Department of Regional Planning, the County Fire Department, the County Department of Public Works, and the County Department of Public Health. SCAQMD, Regional Water Quality Control Board, DOGGR, and Culver City Fire Department shall be invited to appoint a representative from their agency as a member of the MACC.

b. MACC Chair. The Director or his designee shall chair the MACC meetings and shall coordinate all MACC activities including scheduling and keeping minutes of MACC meetings.

c. MACC Meetings. The MACC shall determine its meeting schedule.

d. Documents Provided to the MACC. Copies of all monitoring and compliance reports, plans and other documents that are requirements of this section shall be submitted to the MACC.

9. Related County Code Provisions. The County Code contains a number of provisions related to Oil Wells and Oil Field operations. The intent of this section is to augment those provisions. Where the requirements of this section differ from those in the County Code, they shall be deemed to supersede those provisions that apply to the rest of the unincorporated area. If it is unclear whether a County Code provisions or a provision of this section is applicable, the provision most protective of health, safety and the environment shall be followed.

H. Permitting

1. Director's Review Required. The Operator shall apply and receive approval of a Director's Review pursuant to the provisions of Part 12 of Chapter 22.56 prior to any new Drilling and Redrilling. New Drilling and Redrilling approved through a Director's Review procedure shall be limited to no more than 53 wells per year. The Director's Review procedures shall also apply to emergency actions determined by the Director as necessary to prevent an imminent hazard, or to other immediate measures required for the purposes of protecting health and safety. No new Permits for Drilling or Redrilling shall be approved by the Director unless the subject Wells have been approved as part of an annual drilling plan as described in subsection E.27.d. The Well Pad Revegetation and Screening Plan as required by subsection E.10.a shall be submitted with the application for the Wells covered by the application. Approval shall not be granted until copies of all related permits have been submitted to the Director; other permits

include, but are not limited to the permits required by DOGGR, the County Fire Department; the County Department of Public Works, the County Sanitation District, RWQCB, SCAQMD and other pertinent agencies identified by the Director.

2. Conditional Use Permit Required. Provided a conditional use permit has first been obtained as provided in Part 1 of Chapter 22.56, and while such permit is in full force and effect in conformity with the conditions of such permit, the following uses may be established:

a. Drilling or Redrilling that exceeds the maximum number allowed pursuant to a Director's Review.

b. Steam Drive Plant,

c. New Tanks with a capacity of greater than 5,000 barrels, and

3. Conditional Use Permit Requirements. For those uses requiring a condition use permit, in addition to the requirements of Part 1 of Chapter 22.56, the applicant shall substantiate to the satisfaction of the hearing officer that:

a. The requested use is in compliance with the provisions of this section; and

b. All reasonable measures were taken to reduce and minimize potential impacts from the proposed operation.

4. Application Where Violation Exists. No application required pursuant to this section shall be accepted for processing or approved where any existing use in the District is being maintained or operated in violation of any material provision of this title.

I. Enforcement.

In addition to the provisions of Part 6 of Chapter 22.60, the Operator shall be subject to the following enforcement provisions:

1. Civil Penalties and Performance Security. The Operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of,

the Director in an amount not less than $1,000 or more than $10,000 per day per violation. For this purpose, the Operator shall deposit the sum of $100,000 in an interest-bearing trust fund with the County Department of Regional Planning within thirty days of the effective date of this section, to establish a draw down account. A written notice of violation and the associated penalty will be sent to the Operator. If the noted violation is not corrected to the satisfaction of the Director within the time period set forth in the notice of violation, the penalty amount cited in the notice of violation will be deducted from the account. If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the Operator will be notified of such deduction. Once the deposit has been depleted by 50 percent of the initial amount ($50,000), the Operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit ($100,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the Operator conducts Oil Operations within the District. If the Operator is dissatisfied with the action of the Director, the Operator may file an appeal with the Hearing Officer within 15 days after receipt of notification. Upon receiving a notice of appeal, the Hearing Officer shall take one of the following actions.

a. Affirm the action of the Director;

b. Refer the matter back to the Director for further review with or without instructions; or

c. Set the matter for public hearing and, after hearing, affirm, modify or reverse the action of the Director.

The decision of the Hearing Officer shall be final.

2. Access to Records and Facilities. As to any condition which requires for its effective enforcement the inspection of records or facilities by the County or its agents, the

Operator shall make such records available or provide access to such facilities upon reasonable notice from the County. The County agrees to keep such information confidential where required or permitted by law and requested by the Operator in writing.

3. Right of Entry. Any officer or employee of the County of Los Angeles, or his or her duly appointed representative, whose duties require the inspection of the Oil Field premises shall have the right and privilege at all reasonable times, to enter upon any premises upon or from which any Oil Operations are being conducted for which any permit is required under this section, for the purpose of making any of the inspections pursuant to this section, or in any other ordinance of the County, or for any other lawful purpose, but for safety reasons, shall be accompanied by the Operator or a designee of the Operator and shall wear all appropriate personal protection equipment in accordance with the Operator's established health and safety policies.

J. Public Outreach

1. Community Advisory Panel (CAP). A Community Advisory Panel shall be established by the Director to foster communication about ongoing operations at the Oil Field and to allow the community representatives to provide input to the County and the Operator.

a. CAP Members. The CAP may include representatives of the County, the City of Los Angeles, the City of Culver City, West Los Angeles College, the Operator, the Landowners, and each of the major neighborhoods surrounding the Oil Field (including Ladera Heights, Windsor Hills, Oak Park, View Park, Culver Crest, Blair Hills and Raintree). The Operator and each of the governmental entities previously referred to may each designate a representative to the CAP. The Landowners, and each of the neighborhood organizations of the surrounding communities, may submit a nomination to the Director for appointment to the CAP. Where there is no neighborhood organization, a community resident may make a request to the Director to be appointed to the CAP. School districts with schools in the vicinity of the Oil Field

and the Lessors may make a request to the Director to have a representative appointed to the CAP.

b. CAP Meetings. The CAP shall determine its meeting schedule.

c. Documents Provided to the CAP. A notice of availability of all monitoring and compliance reports and results, all plans, audits and studies, and any other available documents that are required by this section shall be submitted to the CAP promptly after they are prepared or otherwise available. Copies of these reports, documents and other items shall be provided to CAP members upon request except to the extent information therein may not be legally disclosed. Prior to each CAP meeting, the County shall provide to the CAP a list of all violations of the provisions of this section that have occurred since the last CAP meeting.

2. Community Relations

a. Community Meetings. The Operator shall hold community meetings on an annual basis to provide updates on Oil Operations.

b. Newsletter. The Operator shall publish an informational newsletter annually, which shall contain updated information on Oil Operations including Drilling, Redrilling, Maintenance, repair and Reworking activities and all completed or recently filed conditional use permits for the Oil Field. The newsletter shall be mailed to all owners of property located within 1,000 feet of the Outer Boundary Line; all owners of property within 1,000 feet of the perimeter of the District as shown in the records of the County Assessor's Office; to any person or entity who has filed a written request therefore with the Director; and to neighboring Cities. The Operator shall also make these newsletters available on the Oil Field Web Site. The Oil Field Web Site shall be publicized in each newsletter.

c. Oil Field Web Site. The Operator shall maintain and update on a regular basis an Oil Field Web site that shall include information on Oil Operations at the Oil Field, including Drilling and Production activities. All monitoring and compliance reports and results,

plans, audits and studies, and any other available documents that are required by this section (except to the extent they contain information that may not legally be disclosed) shall be promptly posted on the Oil Field Web Site in pdf format.

3. Ombudsperson. The Operator shall designate employees or authorized agents to serve as Ombudspersons to respond to questions and concerns concerning the Oil Operations. Each Ombudsperson shall be familiar with all the provisions of this section and all conditions of approval related to permits and approvals issued by the County or the State of California. It shall be the further responsibility of the Ombudsperson to facilitate, to the extent feasible, the prompt resolution of any issues that may arise relating to the foregoing matters or the impacts of the Oil Operations. The name, title, email address and telephone number of the Ombudsperson shall be posted on the Oil Field Web Site, prominently displayed in the newsletter, distributed twice per year to the CAP and MACC, and provided to any other persons requesting such information. An Ombudsperson shall be available at all times, and shall respond within one hour after an initial call. An Ombudsperson shall also meet at reasonable times with interested parties in an attempt to resolve issues related to Oil Operations. An Ombudsperson shall have authority to initiate a response on behalf of the Operator in all foreseeable matters. The Operator shall be required to maintain a written log of all calls to the Ombudspersons registering complaints or concerns regarding Oil Operations or other matters. The log shall include the complainant's name, date, time, phone number, nature of complaint and the response or resolution offered. A copy of the log shall be provided to the Director, the MACC and the CAP on a quarterly basis.

K. Transitional Provisions

This subsection K includes several provisions that will only be relevant for a short period after the adoption of this Ordinance. Other provisions in this subsection K recognize that it may take some time after the adoption of this Ordinance for the Oil Field to fully comply with particular

subsections of this Ordinance, and they set forth the time periods within which such compliance is to be achieved. As used in this subsection K, the term “Effective Date” shall mean 30 days after the County Board of Supervisors adopts this Ordinance. Except to the extent specifically provided below, all provisions of this section are to be fully complied with immediately upon the Effective Date of this ordinance. If, in the judgment of the County Counsel, any of the provisions in this subsection K become obsolete by virtue of the expiration of the time frames referred to therein or the completion of all acts required thereby, the County Counsel shall so advise the Board of Supervisors and recommend deletion of the obsolete provisions.

1. Fire Protection and Emergency Response.

a. Fire Protection Audit. Within 120 days of the Effective Date, or as may be extended by the Fire Chief for good cause shown, the Operator shall complete a third-party audit of the Oil Field’s fire protection capabilities to evaluate compliance with NFPA requirements, the County Fire Code, the County Fire Department Regulations, California Code of Regulations, and API requirements. The third-party auditor shall be selected and funded by the Operator, subject to the approval of the Fire Chief and the audit shall be conducted in cooperation with the County Fire Department. County Fire may request that the Culver City Fire Department participate in the audit. Issues addressed in the audit shall include, but not be limited to, fire monitor placement, fire water capabilities, fire detection capabilities and fire foam requirements. The audit results and any corrective action plan shall be submitted to the Fire Chief for approval. The corrective action plan shall identify any non-compliance item, describe the corrective action to be taken, and provide a deadline for the completion of each such corrective action, which may be extended by the Director after consultation with the Fire Chief for good cause shown. The Operator shall submit to the Fire Chief monthly updates on the corrective action plan until such time as all corrective actions have been completed.

b. Community Alert Notification System (CAN). Within 120 days of the Effective Date, or as may be extended by the Fire Chief for good cause shown, the Operator shall submit to the Fire Chief for review and approval a design for the Community Alert Notification (CAN) System referred to in subsection E.1.a. The Operator shall take such actions as may be necessary for the CAN system design to be approved by the Fire Chief. The CAN system shall be operational within one year of receiving approval for the CAN system design from the Fire Chief, or as may be extended by the Fire Chief for good cause shown.

c. Spill Containment Response Training. The spill containment response training and equipment required by subsection E.1.b shall be in place no later than 90 days after the Effective Date, or as may be extend by the Director for good cause shown.

d. Emergency Response Plan. Within 30 days after the Effective Date, or as may be extended by the Fire Chief for good cause shown, the Operator shall submit to the Fire Chief an Emergency Response Plan satisfying the requirements of subsection E.1.c.

2. Air Quality and Public Health.

a. Odor Minimization Plan. Within 90 days of the Effective Date, or as may be extend by the Director for good cause shown, the Operator shall develop and deliver to the Director an Odor Minimization Plan for review and approval satisfying the requirements of subsection E.2.c. The Plan shall be reviewed and approved by the Director in consultation with the SCAQMD. The Operator will take such actions as may be necessary for the Plan to be approved by the Director.

b. Air Monitoring Plan. Within 90 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall develop and deliver to the Director an Air Monitoring Plan for review and approval satisfying the requirements of subsection E.2.d. The Plan shall be reviewed and approved by the Director in consultation with the SCAQMD. The Operator will take such actions as may be necessary for the Plan to be

approved by the Director. The Plan shall also include the monitoring of total hydrocarbon vapors and hydrogen sulfide during Drilling, Redrilling and Reworking operations, and total hydrocarbon vapors at the Gas Plant, as required by subsection E.2.d. The Plan shall specify the number, type and location of monitors that will be used, and shall provide detailed information concerning the reliability of the instrumentation, frequency of calibration and additional information that may be requested by the Director. No permits or other approvals for Drilling or Redrilling shall be issued by the County until the Plan has been approved by the Director.

c. Oil Tank Pressure Monitoring and Venting. Within 180 days of the Effective Date, or as may be extend by the Director for good cause shown, the Operator shall install and have fully operational the Tank pressure monitoring system required by subsection E.2.f.

d. Meteorological Station. Within 120 days of the Effective Date, or as may be extend by the Director for good cause shown, the Operator shall submit to the SCAQMD a design for the installation of a meteorological station at the Oil Field that shall meet all the requirements of the United States Environmental Protection Agency guidelines on meteorological data as outlined in EPA Publication “Meteorological Monitoring Guidance for Regulatory Modeling Applications” (EPA-454/R-99-005) as published in February 2000. The Operator shall take such actions as may be necessary to promptly secure SCAQMD approval of such design. The meteorological station shall be installed and fully operational within 180 days of receipt of approval of the design from the SCAQMD, or as may be extend by the Director for good cause shown.

e. Fugitive Dust Control Plan. Within 120 days of the Effective Date, or as may be extend by the Director for good cause shown, the Operator shall develop and deliver to the Director for review and approval a Fugitive Dust Control Plan referred to in subsection E.2.p.

The Operator shall take such actions as may be necessary for the Plan to be approved by the Director.

f. Well Amortization Report. Within 120 days of the Effective Date, or as may be extend by the Director for good cause shown, the Operator shall develop and submit to the Director a Well Amortization Report that inventories the existing Wells that are located within, partially or wholly, the setback area specified in subsection E.2.n. The report shall also include an amortization and abandonment schedule for the Wells located within the setback area, based upon useful economic life.

3. Safety and Risk of Upset.

a. Propane and Natural Gas Liquids Bullet Fireproofing. Within 90 days of the Effective Date, or as may be extended by the Director after consultation with the Fire Chief for good cause shown, the Operator shall install fire-proofing insulation on all propane and natural gas liquids bullets within the Oil Field, as required by subsection E.3.b.

b. Gas Plant Audit. Within 120 days of the Effective Date, or as may be extended by the Director after consultation with the Fire Chief for good cause shown, the Operator shall conduct a third-party audit of the Gas Plant, including the gas liquids storage and loading area, to evaluate compliance with the County Fire Code, API standards, CalARP Program, and all applicable SPCC and Emergency Response Plan requirements. The third-party auditor shall be selected and funded by the Operator and approved by the Fire Chief. The review shall include a seismic assessment, which shall be undertaken by a seismic engineer in compliance with Local Emergency Planning Committee Region 1 CalARP Program Seismic Assessments Guidance. The audit results and any corrective action plan shall be submitted to the Fire Chief for approval. The corrective action plan shall identify the non-compliance item(s), if any, describe the corrective action to be taken, and provide a deadline for the completion of each such corrective action. Items requiring corrective action as a result of the audit shall be

categorized as follows: Category 1-Significant potential for serious: personal injury, negative environmental impact, property damage or hazardous material release. Category 2-Moderate potential for serious: personal injury, negative environmental impact, property damage or hazardous material release. Category 3-Low potential for serious: personal injury, negative environmental impact, property damage or hazardous material release. Category 4-Housekeeping and other maintenance items. Category 1 items shall be resolved to the satisfaction of the Fire Chief as soon as possible. The Operator shall submit to the Fire Chief monthly updates on the corrective action plan until such time as all corrective actions have been completed.

c. Oil Tank Secondary Containment. Within one year of the Effective Date, or as may be extended by the Director after consultation with the Fire Chief for good cause shown, the Operator shall demonstrate to the satisfaction of the Fire Chief that secondary containment satisfying the requirements of subsection E.3.d.i is in place for all existing Tank areas covered by said subsection.

d. Retention Basins. Within 120 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall demonstrate to the satisfaction of the Director of Public Works that all retention basins in the Oil Field satisfy the requirements of subsection E.3.d.ii.

e. Above Ground Piping Containment. Within one year of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall demonstrate to the satisfaction of the Director of Public Works that secondary containment satisfying the requirements of subsection E.3.d.iii is in place.

4. Geotechnical.

a. Accelerometer. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator, in coordination with the Caltech Seismological Laboratory, shall install at the Oil Field and have fully operational an accelerometer as required by subsection E.4.g.

b. Tank Seismic Assessment. Within 180 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall complete a seismic assessment of all Tanks with a capacity greater than 5,000 barrels that contain or could contain Oil. The seismic assessment shall be prepared by a California licensed Civil and/or Structural Engineer approved by the Director of Public Works, and shall comply with the County Building Code. The seismic assessment results and any corrective action plan shall be submitted to the Director of Public Works for review. The corrective action plan shall indicate any work necessary requiring a building permit under the County Building Code, and provide a deadline for obtaining permits and completing construction of each corrective action, which may be extended by the Director of Public Works for good cause shown. The Operator shall submit to the Director of Public Works all required plans, reports, and calculations, and shall pay all necessary fees to the County and other regulatory agencies involved in the permit process. The Operator shall submit to the Director of Public Works monthly updates on the corrective action plan until such time as all corrective actions have been completed.

c. Erosion Control Plan. Within 180 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall develop and submit to the Director of Public Works for review and approval an Erosion Control Plan that satisfies the requirements of subsection E.4.c.i. The Operator shall take such actions as may be necessary for the Plan to be approved by the Director.

d. Accumulated Ground Movement Study. Within 90 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall submit to DOGGR and the Director of Public Works an implementation plan for determining the accumulated ground movement (Subsidence and/or Uplift/rebound) (since post-Baldwin Hills Reservoir failure studies) that is acceptable to DOGGR and the Director of Public Works. The plan shall identify the survey measurement parameter, including fixed reflector locations (as appropriate) that shall be used in the survey. The plan shall include points within the vicinity of and in the Oil Field. Measurements shall be made using repeat pass Differentially Interferometric Synthetic Aperture Radar technology. Within 90 days of acceptance of the plan, the Operator shall conduct the accumulated ground movement study, which may be extended by the Director after consultation with the Director of Public Works for good cause shown. The study results shall be forwarded to DOGGR and the Director of Public Works. The results of this study shall establish the initial baseline for future ground movement studies.

e. Ground Movement Monitoring Plan. Within 180 days of the Effect Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall submit to DOGGR and the Director of Public Works an acceptable annual Ground Movement (Subsidence and/or Uplift/rebound) Monitoring Plan, as called for by subsection E.4.e.

5. Noise Attenuation.

a. Drilling Quiet Mode Plan. Within 90 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Health for good cause shown, the Operator shall develop and submit to the Director and the Director of Public Health for review and approval a Drilling Quiet Mode Plan, as required by subsection E.5.c. The Operator shall take such actions as may be necessary for the Plan to be approved by the

Director. The Drilling Quiet Mode Plan shall identify specific steps the Operator shall take to minimize evening and nighttime noise from Drilling and Redrilling operations. No Permits or other approvals for Drilling or Redrilling shall be issued by the County until the Plan has been approved by the Director.

b. New Gas Plant Flare. Within 120 days of the Effective Date, or as may be extended by the Director after consultation with the SCAQMD for good cause shown, the Operator shall deliver to the SCAQMD an application for the installation of a new flare that will be capable of handling the full volume of gas from the Gas Plant without elevating vibration levels or low-frequency ambient noise levels at the Outer Boundary Line. The Operator shall thereafter take all reasonable steps necessary to have such permit issued as promptly as possible. The new flare shall be installed and operational within 180 days of receiving a Permit to Construct/Permit to Operate from the SCAQMD, or as may be extended by the Director for good cause shown. Once the new flare is in operation, the existing flare at the Gas Plant shall be decommissioned and removed. Until such time as the new flare is operational, the Operator shall implement operating procedures that limit the amount of Gas going to the existing flare so that the flare does not causes vibration or low level airborne noise at or beyond the Outer Boundary Line.

6. Biological Resources.

a. Special Status Species and Habitat Protection Plan. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall develop and submit to the Director, for review and approval, a Special Status Species and Habitat Protection Plan (as required by subsection E.7.b), prepared by a qualified biologist.

b. Emergency Response Plan. Within 180 days of the Effective Date, which may be extended by the Director for good cause shown, the Operator shall revise and submit to the Director, for review and approval, an updated Emergency Response Plan (as referenced in

subsection E.7.a) to address protection of sensitive biological resources and the procedures that would be used to revegetate any areas disturbed during an oil spill or cleanup activities. The Operator shall take such actions as may be necessary for the updated Plan to be approved by the Director. T

7. Cultural/Historic Resources

a. Worker Training. Within 120 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall have a qualified archaeologist prepare training material referred to in subsection E.8.b. The training material shall include any elements requested by the Director.

b. Construction Treatment Plan. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall have a qualified archaeologist prepare a Construction Treatment Plan as required by subsection E.8.c. T

8. Landscaping, Visual Screening and Irrigation. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall develop and submit to the Director, for review and approval, a Landscaping Plan that addresses screening, irrigation and planting protocols for areas near the Outer Boundary Line and along public streets that run through the Oil Field. Upon receipt thereof, the Director shall forward a copy of the Landscaping Plan to the CAP, and shall thereafter consider, if timely submitted, any comments from the CAP as part of the Directors review of the Plan. The Operator shall take such actions as may be necessary for the Plan to be approved by the Director. Installation of all landscaping called for by the approved Landscaping Plan shall be completed within two years of approval by the Director. The Director may withhold County Drilling and Redrilling approvals if the landscaping is not in place at the end of said period, unless the period is extend by the Director for good cause shown. The Landscaping Plan shall be prepared and its implementation

and compliance monitored by a licensed landscape architect approved by the Director. Required elements of the Landscaping Plan shall be identified by the Director.

9. Oil Field Waste Removal. Within 180 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall develop and submit to the Director of Public Works for review and approval a Recycling Plan, as required by subsection E.11.c. The Operator shall take such actions as may be necessary for the Plan to be approved by the Director.

10. Signs.

a. Perimeter Identification Signs. Within 60 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall post the identification signs required by subsection E.13.a.

b. Oil Field Entrance Sign. Within 30 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall post a sign at the main entrance of the Oil Field as required by subsection E.13.b.

c. Other Required Signs. Within 60 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall post all identification signs, warning signs, no trespassing signs, and other signs required by subsection E.13.c.

d. Well Identification Signs. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall post Well identification signs at each Well location, as required by subsection E.13.d.

e. No Littering Signs. Within 120 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall post "No littering" signs as required by subsection E.13.e.

11. Painting. Within two years of the Effective Date, or as may be extended by the Director for good cause shown, all visible structures within the Oil Field shall be painted or

otherwise surfaced as required by subsection E.14. The Operator shall on a semi-annual basis, deliver to the Director a report on the progress of the painting.

12. Water Management Plan. Within 180 days of the Effective Date, or as may be extended by the Director after consultation with the Director of Public Works for good cause shown, the Operator shall develop and submit to the Director and the Director of Public Works for review and approval a Water Management Plan as required by subsection E.18. The Operator shall take such actions as may be necessary for the Water Management Plan to be approved by the Director and the Director of Public Works.

13. Ground Water Monitoring. Within one year of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall design a groundwater quality monitoring program and install monitoring wells, as required by subsection E.19.

14. Storage of Equipment. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall develop and deliver to the Director, for review and approval, an Equipment Storage Site Plan as required by subsection E.21. The Operator shall take such actions as may be necessary for the Plan to be approved by the Director.

15. Oil Field Cleanup and Maintenance. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall develop and submit to the Director, for review and approval, an Unused or Abandoned Equipment Removal Plan identifying all equipment at the Oil Field that is no longer in service and can be removed. This Plan shall provide an inventory of all unused equipment and procedures for testing and handling the equipment pursuant to the Operator's Health and Safety protocol. The plan will identify a schedule for removal of the out of service equipment. The Operator shall take such actions as may be necessary for the Plan to be approved by the Director. The Plan shall be implemented in accordance with the schedule for removal contained therein, and in all events shall be fully

implemented within one year of the Director's approval, unless extended by the Director for good cause shown. A compliance report shall be filed with the Director semi-annually until all the unused or abandoned equipment identified in the Plan has been removed.

16. Storage of Hazardous Materials. Within 30 days of the Effective Date, or as may be extended by the Fire Chief for good cause shown, the Operator shall submit a copy of the Operators most recent a Hazardous Material Business Plan as required by subsection E.26.

17. Drilling, Redrilling and Reworking Operations. Drilling, Redrilling, Well Abandonment and Well Pad Restoration Plan. Within 60 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall submit to the Director the first of the Annual Drilling, Redrilling, Well Abandonment and Well Pad Restoration Plans required by subsection E.27.d, and shall comply with the provisions of said subsection with respect to such Plan. No permits or other approvals for Drilling or Redrilling shall be issued by the County until such Plan has been approved by the Director.

18. Processing Operations.

a. Pipelines. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall comply with E.28.f.ii.

b. Active Pipeline Plot Plan. Within one year of the Effective Date, or as may be extended by the Fire Chief for good cause shown, the Operator shall submit to the Fire Chief the plot plan required by subsection E.28.g.

19. Tanks. Within 180 days of the Effective Date, or as may be extended by the Fire Chief for good cause shown, the Operator shall develop and submit to the Fire Chief, for review and approval, a program for detecting and dealing with Tank bottom leaks, as required by subsection E.30.e. The Operator will take such actions as may be necessary for the program to be approved by the Fire Chief.

20. Monitoring and Compliance.

a. Environmental Quality Assurance Program (EQAP). Within 90 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall develop and submit to the Director, for review and approval, an Environmental Quality Assurance Program (EQAP) as required by subsection F.1. The Operator will take such actions as may be necessary for the EQAP to be approved by the Director. No permits or other approvals for Drilling or Redrilling shall be issued by the County until the EQAP has been approved by the Director.

b. Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP). Within 180 days of the Effective Date, or as may be extended by the Director after consultation with the Fire Chief for good cause shown, the Operator shall develop and submit to the Director and Fire Chief, for review and approval, the Safety Inspection, Maintenance and Quality Assurance Program (SIMQAP) referred to in subsection F.3. The Operator will take such actions as may be necessary for the SIMQAP to be approved by the Director and Fire Chief.

c. Compliance Audit. Within 180 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall deliver to the Director the first third-party Compliance Audits required by subsection F.4, and shall comply with the provisions of said subsection with respect to such audit.

21. Administrative Items. The Multiple Agency Coordination Committee (MACC) called for by subsection G.6 shall be established within 60 days of the Effective Date.

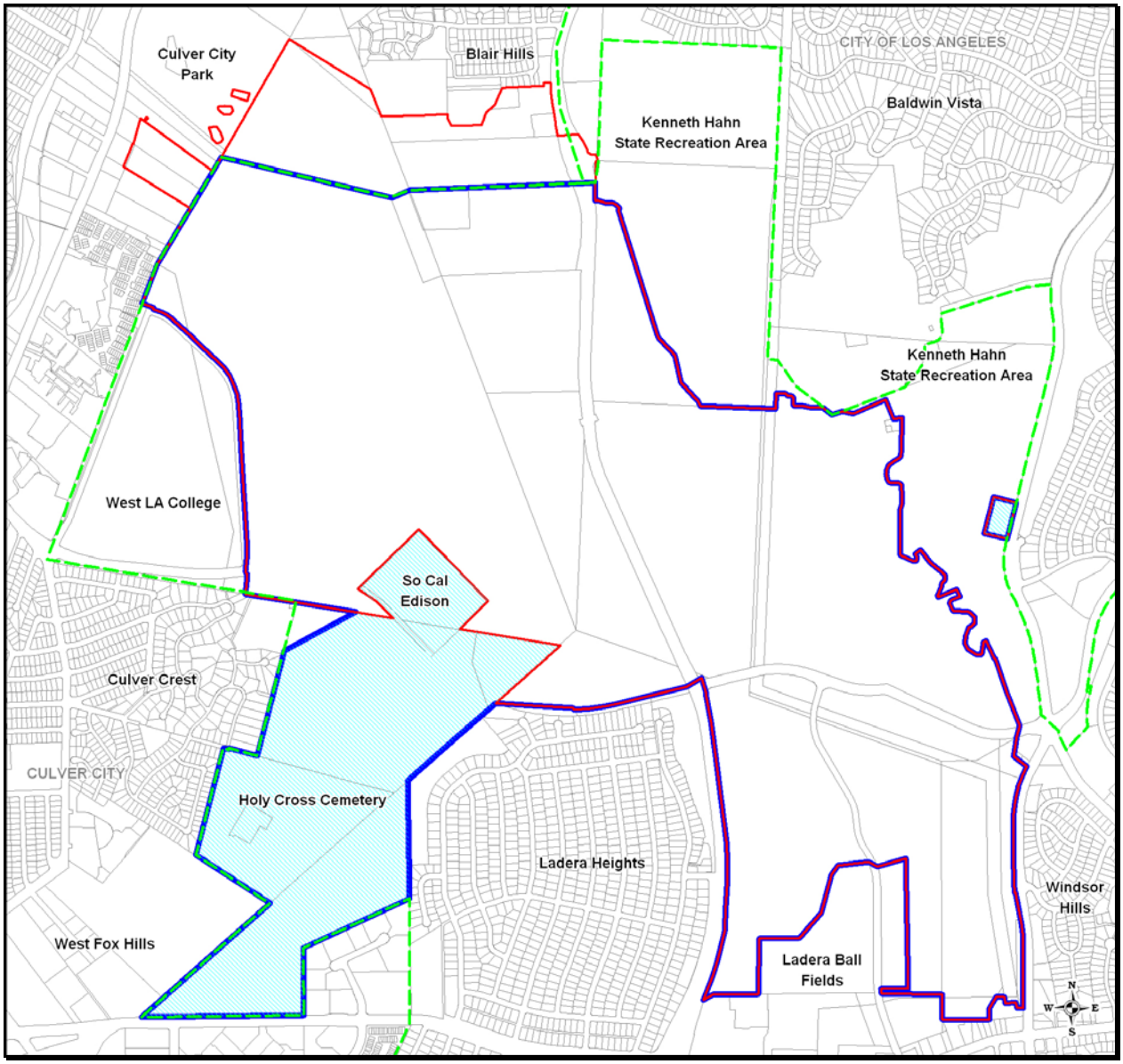
22. Public Outreach.

a. Citizens Advisory Panel (CAP). The Citizens Advisory Panel referred to in subsection J.1 shall be established within 60 days of the Effective Date.

b. Oil Field Web Site. Within 90 days of the Effective Date, or as may be extended by the Director for good cause shown, the Operator shall launch the Oil Field Web Site required by subsection J.2.c.

c. Community Meeting. The Operator shall hold the first community meeting called for by subsection J.2.a within 60 days of the Effective Date.

Baldwin Hills Community Standards District Boundaries



ATTACHMENT 5: RECOMMENDED CHANGE TO COMMUNITY STANDARDS DISTRICT SUBSECTION 22.44.xx1.1

I. Enforcement.

In addition to the provisions of Part 6 of Chapter 22.60, the Operator shall be subject to the following enforcement provisions:

1. Civil Penalties and Performance Security. The Operator shall be subject to a penalty for violation of any requirement of this section as determined by, and at the discretion of, the Director in an amount not less than $1,000 or more than $10,000 per day per violation. For this purpose, the Operator shall deposit the sum of $100,000 in an interest-bearing trust fund with the County Department of Regional Planning within thirty days of the effective date of this section, to establish a draw down account. A written notice of violation and ~~the~~ any associated penalty as determined by the Planning Director will be sent to the Operator and the penalty amount cited in notice of violation. ~~If the noted violation is not corrected to the satisfaction of the Director within the time period set forth in the notice of violation, t~~The penalty amount cited in the notice of violation will be deducted from the account. ~~If the violation is corrected within the time period set forth in the notice of violation, but recurs any time within a six-month period, the penalty will be deducted from the account upon each recurrence and the Operator will be notified of such deduction.~~ Prior to withdrawal from the account, the Operator may appeal the penalty to the Hearing Officer within 10 days if the receipt of the notice of violation. Once the deposit has been depleted by 50 percent of the initial amount ($50,000), the Operator shall deposit additional funds sufficient to bring the balance up to the amount of the initial deposit ($100,000) within 10 business days of notification. There is no limit to the number of supplemental deposits that may be required while the Operator conducts Oil Operations within the District. If the Operator is dissatisfied with the action of the Director, the Operator may file an appeal with the Hearing Officer within ~~15~~ 10 days after receipt of notification. Upon receiving a notice of appeal, the Hearing Officer shall take one of the following actions.

ATTACHMENT 6: NOT USED

ATTACHMENT 7: ENVIRONMENTAL DOCUMENT

ATTACHMENT 8: ENVIRONMENTAL FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

FINDINGS OF FACT REGARDING THE FINAL ENVIRONMENTAL IMPACT REPORT AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE BALDWIN HILLS COMMUNITY STANDARDS DISTRICT
County Project Number R-2007-00570
Environmental Case Number RENVT2007-00048

INTRODUCTORY FINDINGS

Pursuant to Public Resources Code Section 21081 and California Code of Regulations, Title 14, Section 15091 ("**State CEQA Guidelines**"), no public agency shall approve or carry out a project where an Environmental Impact Report (the "**EIR**") has been certified, which identifies one or more significant impacts on the environment that would occur if the project is approved or carried out, unless the public agency makes one or more findings for each of those significant impacts, accompanied by a brief explanation of the rationale of each finding. The possible findings, which must be supported by substantial evidence in the record, are:

1. Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant impact on the environment (hereinafter, "**Finding 1**").

2. Changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency (hereinafter, "**Finding 2**").

3. Specific economic, legal, social, technological or other considerations, make infeasible the mitigation measures or Project alternatives identified in the EIR (hereinafter, "**Finding 3**").

For those significant impacts that cannot be mitigated to below a level of significance, the public agency is required to find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant impacts on the environment.

The Board of Supervisors (the "**Board**") of the County of Los Angeles (the "**County**") hereby approves the Baldwin Hills Community Standards District, County Case No. R-2007-00570 ("**the Project**" or the "**CSD**") and certifies the Final EIR ("**FEIR**"), State Clearinghouse Number 2007061133, which consists of the Draft EIR (the "**DEIR**"), the Responses to Comments and other supporting documents, and finds that it has been completed in compliance with CEQA, was presented to the decision-making body of the County and the decision-making body reviewed and considered the information contained in the FEIR prior to certifying the FEIR and approving the Project. The FEIR reflects the independent judgment and analysis of the County and has been completed in compliance with the California Environmental Quality Act (Public Resources Code Section 21000-21177) ("**CEQA**"), and the Board has received, reviewed, and considered the information contained in the FEIR, the application for the Project, all testimony at public hearings and submissions from public officials and others, departments of the County, the applicant, community associations, and other public agencies and all other information in the record prior to its approval of the Project.

Having received, reviewed and considered the foregoing information, as well as any and all other information in the record, the Board hereby makes findings pursuant to, and in accordance with, Section 21081 of the Public Resources Code.

Section 1 of these findings discusses those potential environmental impacts of the Project that were reviewed during the Initial Study process, but were found to be less than significant. Section 2 discusses those potential environmental impacts of the Project that are not significant. Section 3 discusses those potential environmental impacts that have been mitigated to a level of insignificance. Section 4 discusses those unavoidable environmental impacts that cannot be mitigated to a level of insignificance. Section 5 discusses those potential cumulative impacts that are not significant. Section 6 discusses those potential cumulative impacts that have been mitigated to a level of insignificance. Section 7 discusses those cumulative impacts that cannot be mitigated to a less than significant level. Section 8 discusses the potential growth-inducing impacts of the Project. Section 9 discusses the alternatives to the Project as discussed in the FEIR. Section 10 contains findings regarding the Mitigation Monitoring Program. Section 11 contains the Statement of Overriding Considerations. The findings set forth in each section are supported by substantial evidence in the record of the approval of the Project.

In accordance with the provisions of CEQA and the State CEQA Guidelines, the County adopts these findings as part of its certification of the FEIR for the Project.

PROJECT DESCRIPTION

Plains Exploration and Production Company ("**PXP**"), the current operator of the Inglewood Hills Oil Field and the applicant, has submitted an application to the County to establish a CSD for the portion of the Inglewood Oil Field located in the Baldwin Hills Zoned District, an unincorporated area of the County (the "**Oil Field**").

A CSD is a supplemental zoning district that addresses special issues unique to certain geographic areas within the unincorporated areas of the County. The objective of the CSD, which will establish additional development standards, is to address the unique compatibility concerns associated with the Oil Field and the surrounding communities.

Historical Background and Existing Zoning Regulations. Oil and gas production have been ongoing at the Oil Field since the 1920s, consistent with applicable County planning policies and zoning regulations. Following an unusually large escape of hydrocarbons in January, 2006, nearby residents began calling for an environmental analysis of oil and gas production at the Oil Field. Responding to the community concerns, the Board adopted a series of interim urgency ordinances imposing temporary restrictions on oil development at the Oil Field until an environmental analysis could be performed and permanent restrictions adopted. These temporary restrictions expired on June 26, 2008.

The vast majority of the Oil Field is depicted on the County's official zoning maps in the Heavy Agriculture and Restricted Heavy Manufacturing zoning classifications. Title 22 of the County Code permits oil production activities in these zones as a matter of course, with minimal regulation.

Because the temporary restrictions of the interim urgency ordinance have expired and the historical oil and gas operations at the Oil Field are permitted as a matter of course under current County regulations, County regulation of the Oil Field would revert to the less stringent standards of Title 22 if the proposed CSD is not adopted.

The Project Will Not Create Additional Development. PXP has not applied for a permit to drill new wells or to install any new facilities at the Oil Field. The Project analyzed in the EIR is the CSD, not future oil operations, expanded or otherwise. The CSD will regulate the development of what is currently allowed by the applicable planning policies and zoning regulation and will not create additional development.

An EIR typically evaluates the environmental impacts of a proposed development project. In this case, however, the Project is a CSD, which is a regulatory framework only and would not result in any physical change to the environment. Furthermore, because the CSD will enhance the development standards, operating requirements, and procedures that would otherwise be required for future oil and gas production at the Oil Field, the CSD will reduce environmental impacts.

Because the CSD will not result in a physical change to the environment, and merely provides a regulatory framework to enhance regulations of an existing, permitted industrial operation, the County could have alternatively relied upon a negative declaration or mitigated negative declaration to support the approval. Similarly, several categorical exemptions could support the County's adoption of a CSD, including: the common sense exemption (CEQA Guidelines Section 15061(b)(3)); the permitting of an existing facility (CEQA Guideline Sections 15301); minor alterations to land use limitations (CEQA Guidelines Section 15305); actions by regulatory agencies for the protection of natural resources (CEQA Guidelines Section 15307); actions by regulatory agencies for the protection of the environments (CEQA Guidelines Section 15308); and enforcement actions by regulatory agencies (CEQA Guidelines Section 15321).

The EIR Provides Information on a Theoretical Maximum Development Scenario. One of the main goals of the EIR is to determine if the CSD, as initially proposed by PXP ("**Initial Draft CSD**"), has the necessary development standards, operating requirements, and procedures to mitigate the potential environmental impacts of potential future oil field development activities. In order to accomplish this goal, the EIR provides information regarding a maximum growth and disturbance scenario for potential future operations at the Oil Field for the next twenty years ("**Potential Future Oil Field Development Scenario**"). PXP has not applied for any of this future development, and it is unknown at this time if any of this future development will occur. The information in the EIR regarding the Potential Future Oil Field Development Scenario is provided only to ensure that measures to mitigate any future operational scenario, which will be less intense than the Potential Future Oil Field Development Scenario analyzed in the EIR, will be incorporated into the final CSD. The Potential Future Oil Field Development Scenario is not the Project. The Project is the CSD.

Based upon the environmental impact analysis of the Potential Future Oil Field Development Scenario, as regulated by the Initial Draft CSD, the EIR identifies a number of measures that should be added to the Initial Draft CSD to ensure that potential environmental impacts would be mitigated. Those identified mitigation measures have been incorporated into a revised CSD.

Recirculation of the EIR is not required to add mitigation measures to the Initial Draft CSD to further reduce potential environmental impacts because none of the conditions described in State CEQA Guidelines Section 15162 or State CEQA Guidelines Section 15088.5 calling for the preparation of a subsequent or supplemental EIR have occurred.

The CSD Regulates Oil and Gas Activities and Does Not Implement the Baldwin Hills Park Master Plan. The CSD is strictly focused on regulating future oil development at the Oil Field. It is not a regulatory framework to implement the Baldwin Hills Park Master Plan. As such, the EIR does not directly address issues associated with the Baldwin Hills Park Master Plan.

BACKGROUND

A Notice of Preparation was circulated from June 28, 2007 to July 31, 2007. Scoping meetings were held on July 24, 2007 and July 26, 2007. The DEIR was circulated for public review and comment from June 20, 2008 until August 19, 2008.

The Regional Planning Commission held noticed public hearings on August 2, 2008, August 14, 2008, August 27, 2008, September 10, 2008, October 1, 2008 and October 8, 2008 and recommended that the Board approve the Project.

Recirculation of the DEIR was not required because none of the conditions described in State CEQA Guidelines Section 15162 or State CEQA Guidelines Section 15088.5 calling for the preparation of a subsequent or supplemental EIR have occurred. No significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to avoid or mitigate such an effect (including a feasible project alternative) that the project' proponents declined to implement was added to the EIR, including without limitation: no new significant environmental impact resulting from the project or from a new mitigation measure proposed to be implemented; no substantial increase in the severity of an environmental impact; no considerably different feasible project alternatives or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the project which the proponents declined to adopt; nor was the DEIR so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. The new information added to the EIR merely clarified, amplified or made insignificant modifications to the adequate DEIR.

During the comment period, comments were made that recirculation was required because the CSD was revised during the approval process. The revisions included the addition of the mitigation measures identified in the DEIR and other administrative provisions to strengthen County review authority over the Oil Field.

CEQA allows flexibility in revising the project description throughout the approval process. Changes to a proposal during the CEQA process and resulting revisions to the project description are not significant new information requiring recirculation, absent any new significant impacts resulting from those changes. Here, as discussed above, there are no circumstances requiring recirculation. The County's revised CSD incorporates new mitigation measures, which further reduce environmental impacts. No new significant impacts will result from the revisions to the

CSD, which increase the regulatory oversight of the Oil Field. Recirculation is not required because the revised project creates less impacts than the project as initially proposed.

In addition, the revisions do not interfere with public review and comment. The purpose of the EIR was to identify new additional mitigation measures to be incorporated into the Initial Draft CSD to ensure that future oil and gas activities are mitigated. The revised CSD incorporates comments received by the public and the mitigation measures identified in the environmental analysis, as well as other administrative provisions to strengthen the County's enforcement authority and community outreach. Recirculation is not required because the revised County CSD does not create any additional environmental impacts nor does it interfere with public's ability to review and comment on the CSD.

THE FEIR

The DEIR for the Project was prepared in accordance with CEQA, and the State and County guidelines for the implementation of CEQA. The County, has analyzed, reviewed and edited the DEIR sent out for public review and FEIR. The DEIR sent out for public review and FEIR reflect the County's independent judgment.

Pursuant to Sections 15200 through 15205 of the State CEQA Guidelines, the DEIR was circulated for public and agency review from June 20, 2008 until August 19, 2008. A notice of availability of the DEIR was published in the local newspapers, posted on the Project site, and was distributed to known interested individuals and organizations. Copies of the DEIR were available at the Department of Regional Planning and in local public libraries during the 45-day review period.

Public hearings regarding the Project were conducted by the Regional Planning Commission on August 2, 2008, August 14, 2008, August 27, 2008, September 10, 2008, October 1, 2008 and October 8, 2008 and the Board on October 21, 2008 and October 28, 2008. At the close of the public hearing on October 28, 2008, the Board adopted these findings, adopted a resolution certifying the FEIR and approved the Project.

SECTION 1 - POTENTIAL ENVIRONMENTAL IMPACTS THAT WERE DETERMINED TO BE LESS THAN SIGNIFICANT DURING THE SCOPING PROCESS

Upon completion of the scoping process, the determination was made that analyses of agriculture, housing, and schools and police protection were not required in the EIR.

1.1 AGRICULTURE

While a large portion of the Baldwin Hills Oil Field is zoned Heavy Agriculture (A-2), the site is not used for agricultural purposes, and the property would not be considered prime agricultural land. None of the surrounding land uses in the vicinity of the Baldwin Hills Oil Field are used for agriculture. Neither the proposed CSD nor the future drilling and operational activities would affect any agricultural activities, therefore, there would be no impacts to agriculture.

1.2 HOUSING

The future drilling and operational activities would not affect existing housing through demolition, conversion, or removal of existing housing stock as there are currently no occupied residential structures on the site. Therefore, no residents would be displaced as part of the proposed CSD or the future drilling and operational activities.

The future drilling and operational activities would not result in a significant increase in the number of workers in the Baldwin Hills Oil Field. The majority of workers at the oil fields come from the Los Angeles basin and would not place new demands on housing in the area. While some new workers could be hired who would have to relocate to the Los Angeles area, this number would not be expected to significantly affect the housing market. Therefore, the future drilling and operational activities would not be expected to have a significant impact on the availability or demand for housing in the project area.

1.3 SCHOOLS AND POLICE PROTECTION

The future drilling and operational activities would not result in a significant increase in the number of workers in the Baldwin Hills Oil Field. The majority of workers at the oil field come from the Los Angeles basin and would not represent new population in the area. While some new workers could be hired who would have to relocate to the Los Angeles area, this number would not be expected to significantly affect the overall population of the area. Therefore, the future drilling and operational activities would not result in a need for new or altered police protection and/or health care services, nor would it generate a significant increase in the number of local students.

SECTION 2 - POTENTIAL ENVIRONMENTAL IMPACTS THAT ARE NOT SIGNIFICANT (NO MITIGATION REQUIRED)

2.1 CLIMATE CHANGE (GREENHOUSE GASES)

Please refer to EIR Section 4.2. for an analysis of air quality impacts, including global climate change and greenhouse gas emissions.

Potential Effects And Rationale Supporting Finding:

Ultimately, determining whether the proposed potential future development's contribution of greenhouse gases is significant or not significant requires a knowledge of incremental effects that is not currently available. Thus, determining whether the potential future development greenhouse gas emissions would contribute to a significant impact associated with global climate change, considering that no quantifiable numeric threshold exists for such an impact, would be speculative.

Notwithstanding, the EIR quantified the greenhouse gas emissions associated with potential future operations. Due to the drilling and new equipment and the increase in operations of the existing equipment, direct emissions of greenhouse gases would likely increase.

Furthermore, the crude oil produced from the potential development would be delivered to Los Angeles area refineries and refined into gasoline, diesel, jet fuel and a range of end products. Greenhouse gas emissions would be associated with the transportation, refining and end-use of the refined products, including natural gas, propane and crude oil after it has been processed and distributed. Natural gas would be burned in homes, businesses and burned to produce electricity. Propane would be used for residential (barbeques, etc), transportation and industrial fuel. However, the potential future development would not increase the consumption of these refined products as the consumption of natural gas, propane and crude oil products is not a function of the source of the gas or crude oil supply. Therefore, there would be no net increase in greenhouse gas emissions associated with the potential development end-use products over current production related end-use greenhouse gas emissions.

As discussed in Section 4.2.7 of the FEIR, California imports over 60% of the crude oil used on an annual basis. The amount of crude oil imports is expected to increase as California crude oil production declines. With increase crude oil production from the Oil Field would serve to reduce the level of crude oil imports into California on a barrel for barrel basis. This reduction of crude oil imports would result in a reduction in greenhouse gas emission associated with the transportation of crude oil via marine tanker.

While it would be too speculative to identify any significant impacts and no mitigation is required, methods to reduce or offset GHG emissions are numerous. The field currently implements a number of measures that reduce greenhouse gas emissions, including vapor recovery on all tanks and operation of all pumping units and compressor on electricity. Some potential mitigation measures the Operator/Applicant could additionally undertake include, but are not limited to, the following:

- The reduction in energy use at the field, including natural gas and electricity, from existing and proposed sources, would reduce greenhouse gas emissions. This would reduce greenhouse gas emissions from fuel combustion and electrical generation. The most significant reduction could be achieved through the use of cogeneration for production of both steam for the steam drive plant and electricity to satisfy part of the large electrical demand of the field. The California Energy Commission Integrated Energy Policy report (CEC 2007) specifically directs that "The state adopt greenhouse gas reduction measures and regulations that fully reflect the benefits of combined heat and power." Replacement of existing pumping units with newer, more efficient electric motors and increasing the efficiency of field-wide operations, particularly in regards to flaring of gasses and use of the normally flared gasses, would further reduce greenhouse gas emissions through a reduction in gas and electrical consumption.

- Reducing water and raw material use and waste generation and increasing recycling would reduce greenhouse gas emissions by reducing the energy used to transport/pump water and to produce goods and truck trips, with their associated diesel fuel combustion, to produce and transport waste and materials.

- Biodiesel (fatty acid methyl ester, or FAME) is produced from plant crops, such as soybeans. Because it is made from plant sources, the carbon in the biodiesel has been recently removed from the atmosphere and therefore does not contribute to greenhouse

gas emissions. It can be used by diesel vehicles (UC 2007). The American Society of Testing and Materials has approved a standard for FAME at blend levels up to 20 percent by volume but some engine manufacturers caution about blends over 10 percent. Replacement of 10-20% of the diesel fuel with biodiesel would reduce greenhouse gas emissions by a similar amount. Biodiesel could be used in drilling engines or could be used in other area engines, such as school busses, to offset direct emissions from the potential future development.

Some projects could be undertaken offsite to offset the emissions from site operations. These might include:

- Planting of trees removes CO2 from the atmosphere as the tree grows. Trees remove CO2 from the atmosphere through photosynthesis and store or "sequester" the carbon in the tree trunk, branches and leaves. Trees serve as effective carbon sinks since about one-half of the dry weight of the wood is carbon. Forests store more carbon dioxide than the entire atmosphere (IPCC 2007). CO2 sequestration rates vary by tree type and by land type/quality up to about 10 tons per acre. Tree planting for GHG emission reductions is somewhat controversial as the trees only store/sequester the carbon until they are fully grown. When they die and decay or are used for fuel, they release the carbon they have absorbed while growing. Tree forests for greenhouse gas emission reductions must be managed and maintained and new trees grown to replace trees that have died in order to maintain the sequestration of the carbon. According to the Intergovernmental Panel on Climate Change, on the global level, 12-15% of total global carbon emissions per year could be managed through forestry activities.

- Methane capture is currently a promising technology that would enable the conversion of methane emissions from cow manure into fuel. This would reduce greenhouse gas emissions by taking advantage of the global warming potential difference between CH4 and CO2 (as use of the methane as a fuel would produce CO2).

- Retrofitting diesel busses with more efficient, hybrid-diesel engines would decrease greenhouse gas emissions through an increase in the fuel economy and efficiency and an associated decrease in fuel combustion. This would be true with the use of electric shuttles due to the advantages in electrical generation over fuel combustion (discussed above).

With the application of the recommended mitigation measures, the net direct greenhouse gas emissions could be reduced. Greenhouse gas emissions from indirect sources (electricity generation) are currently addressed through CPUC Emission Performance Standard policies (Commission's Rulemaking on greenhouse gas policies R.06-04-009) and Senate Bill 1368 requiring that electricity generators produce power more efficiently, with an efficiency equal to or below a combined cycle gas turbine (1,100 lbs CO2/MWh). This would lower the greenhouse gas emissions from the electric resource mix, as greenhouse gas emissions associated with electrical generation from coal and gas would be lowered (currently 2,100 and 1,235 lbs/MWH, respectively, for the CALISO area), and would address the reduction in greenhouse gasses from indirect electrical generation.

Finding:

For the foregoing reasons, future development will have a less than significant impact on global climate change and greenhouse gas emissions.

2.2 GEOLOGICAL RESOURCES—DETERIORATION OF OIL INFRASTRUCTURE

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including deterioration of oil infrastructure.

Potential Effects And Rationale Supporting Finding:

Deterioration due to corrosion, weathering, fatigue, or erosion, could potentially reduce the structural stability of existing and proposed oil field infrastructure.

Oil field infrastructure, including the proposed steam generation plant, oil cleaning plant, water treating facility, and pipelines, as well as existing infrastructure, including pipelines, storage tanks, valves, manifolds, and injection well casing, would be susceptible to oil leaks related to corrosion, weathering, fatigue, or erosion. California Code of Regulations Title 14, Section 1774(i) requires environmentally sensitive pipelines to have a pipeline management plan. The California Division of Oil, Gas, and Geothermal Resources has designated all pipelines in oil and gas fields within the Los Angeles Basin, including the Inglewood Oil Field, as environmentally sensitive and subject to California Division of Oil, Gas, and Geothermal Resources Pipeline Management Plan requirements. The applicant maintains a pipeline management plan for the Inglewood Oil Field (PXP 2007a), which is on file with the California Division of Oil, Gas, and Geothermal Resources. This plan was last updated in April 2007 (California Division of Oil, Gas, and Geothermal Resources, personal communication 2008). California Division of Oil, Gas, and Geothermal Resources jurisdiction for oil field pipelines is contained in Public Resources Code Section 3106 and California Code of Regulations 14, Sections 1724.2, 1760, 1774, and 1776.

In accordance with the Inglewood Field Pipeline Management Plan (PXP 2007a), a mechanical integrity test is performed every two years on all active, environmentally sensitive pipelines. (as Mechanical testing, including ultrasonic and hydrostatic testing, is completed in coordination with California Division of Oil, Gas, and Geothermal Resources staff. Pipelines less than 10 years old are exempt from the two year testing requirement. In addition, the Applicant maintains an Emergency Response Action Plan (PXP 2007b), which includes Specific Incident Response Checklists for potential piping rupture/leak, valve rupture/leak, manifold failure, and storage tank leaks. Therefore, potential impacts associated with deterioration of oil field infrastructure due to corrosion, weathering, fatigue, or erosion, would be reduced to less than significant through implementation of the Pipeline Management Plan and Emergency Response Action Plan.

Although the applicant has already complied with these measures, the EIR lists the following measures to further reduce impacts:

- GR.4-1 The oil field operator shall maintain and implement a Pipeline Management Plan that meets the requirement of the DOGGR regulations.

- GR.4-2 The oil field operator shall maintain and implement an Emergency Response Action Plan that meets the requirement of the Environmental Protection Agency regulations.

- In addition, implementation of Water Resources mitigation measure W R.2-1 would contribute in limiting the potential for subsurface leaks and associated significant groundwater quality impacts.

Finding:

For the foregoing reasons, the Project will have a less than significant impact from deterioration to oil infrastructure.

2.3 GEOLOGICAL RESOURCES—EXPANSIVE SOILS

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including expansive soils.

Potential Effects And Rationale Supporting Finding:

Expansive soil may be present in the Baldwin Hills and may be present in soils used for proposed Project grading. Expansive soils beneath the proposed Project's foundations could result in cracking and distress of foundations. However, during the design phase of proposed Project components, the Project engineer would evaluate the expansion potential associated with on-site soils. The soil expansion potential would be evaluated through a site-specific geotechnical investigation, which includes subsurface soil sampling, laboratory analysis of samples collected to determine soil expansion potential, and an evaluation of the laboratory testing results, by a geotechnical engineer. Recommendations of the engineer would be incorporated into the design specifications for the proposed Project, consistent with County design guidelines. Recommendations for soils subject to expansion typically include overexcavation and replacement of expansive soils with sandy, non-expansive soils, which would allow for construction of a conventional slab-on-grade; construction of post-tensioning concrete slabs, which can accommodate movement of underlying expansive soils; or alternatively, installation of concrete or steel foundation piles through the expansion prone soils, to a depth of non-expansive soils. Such geotechnical engineering would substantially reduce the potential for soil expansion and damage to overlying structures.

Finding:

For the foregoing reasons, the Project will have a less than significant impact from expansive soils.

2.4 WATER RESOURCES—SURFACE WATER QUALITY

Please refer to EIR Section 4.6 for an analysis of impacts to water quality, including surface water quality.

Potential Effects And Rationale Supporting Finding:

New grading and construction, infrastructure abandonment activities, and/or soil remediation could degrade surface water quality.

However, these potential impacts would be reduced to less than significant through stormwater retention and sampling from the six on-site retention basins, as well as implementation of the NPDES mandated Storm Water Pollution and Prevention Plan and Spill Prevention and Control and Countermeasure.

In addition, see Impact GR.5 in Section 4.4, Geological Resources, for additional Best Management Practices related to erosion. The EIR lists the existing measures which the applicant presently complies:

- WR.1-1 The oil field operator shall maintain and implement a construction Storm Water Pollution Prevention Plan that has been inspected by the Los Angeles Regional Water Quality Control Board. This plan is a requirement of the Oil Field NPDES permit.

- WR.1-2 The oil field operator shall maintain and implement a Spill Prevention, Control and Countermeasure Plan that is acceptable to the California Division of Oil, Gas, and Geothermal Resources and/or the U.S. Environmental Protection Agency.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on surface water quality.

2.5 TRANSPORTATION AND CIRCULATION

Please refer to EIR Section 4.7 for an analysis of impacts to transportation and circulation.

Potential Effects And Rationale Supporting Finding:

The EIR analyzed potential traffic impacts at surrounding intersections and street segments as well as impacts on the regional transportation system.

The analysis determined that the traffic volume generated by the potential future oil field development would not significantly impact the traffic flow at the study intersections, roadway segments, or freeway segments. Therefore, traffic mitigation measures are not required of the potential future oil field development. However, because the freeways in the vicinity of the project area are heavily congested during peak commute periods, the Department of Transportation recommends that truck trips on State highways be limited to off-peak commute periods.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on transportation and circulation.

2.6 PUBLIC SERVICES AND UTILITIES—SOLID WASTE

Please refer to EIR Section 4.14 for an analysis of impacts to public services and utilities, including solid waste.

Potential Effects And Rationale Supporting Finding:

Future construction, drilling and operations would generate solid wastes. However, the total increase in solid waste for the potential future oil development would be considered less than significant since it would not exceed the capability of the servicing landfill, which has capacity available for the foreseeable future. Therefore, the solid waste impacts of the potential future oil development are considered to be less than significant. No mitigation measures are required since the impact is less than significant. However, mitigation measure PS.1-1, requiring a recycling plan, is included in the EIR that further reduced potential solid waste impacts.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on solid waste.

2.7 PUBLIC SERVICES AND UTILITIES—WASTE WATER

Please refer to EIR Section 4.14 for an analysis of impacts to public services and utilities, including waste water.

Potential Effects And Rationale Supporting Finding:

Future construction, drilling and operations would generate wastewater. However, the potential future oil field development would not exceed the capacity of the existing sanitary sewer system or treatment plant that serves the project site. As such, the potential future oil field development would not require new or expanded facilities that would cause a substantial physical adverse change in the environment. Consequently, the project would not result in sewage spills or overflows that would have a substantial physical adverse effect on the public health or the physical environment.

Currently, the Inglewood Oil Field main office generates 1,500 gpd (150 gpd/1,000 Gr. sq. ft) of sewage daily. The future development would not include the construction of any new structures requiring sanitary sewer connections. The existing sewage generated onsite is not expected to change with the future oil development activities.

The future oil field development would increase the volume of produced water generated from oil and gas production. All of this produced water would be reinjected back into the producing

formation. Therefore, produced water would not generate any additional wastewater to the sewer system.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on wastewater.

2.8 PUBLIC SERVICES AND UTILITIES—POTABLE WATER DEMAND

Please refer to EIR Section 4.14 for an analysis of impacts to public services and utilities, including potable water demand.

Potential Effects And Rationale Supporting Finding:

Future construction, drilling and operations would increase demand for potable water. However, the proposed project would not substantially deplete water supplies of the purveyor. Furthermore, the project would neither require new off-site water supply or distributions facilities or expansion of existing facilities, the construction of which would cause a substantial adverse physical change in the environment nor would the project require new or expanded water entitlements. Therefore, impacts associated with water supply are considered less than significant and no mitigation is required. However, southern California has periodic droughts and water conservation and reuse is highly recommended to ensure that potable water is available for other uses. Therefore the EIR recommends mitigation measure PS.3-1 requiring a water management plan.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on potable water demand.

2.9 ENERGY AND MINERAL RESOURCES—ELECTRICITY

Please refer to EIR, Section 4.15 for an analysis of impacts to energy and mineral resources, including electricity.

Potential Effects And Rationale Supporting Finding:

Future operations could increase electricity consumption due to the operation of additional electrical equipment. The electrical power requirements would be provided by SCE through the existing power service to the field. The operator indicates that no new transformer requirements are anticipated.

This small increase in electricity would not require modifications or additions to the current electrical facilities at the field. Thus, the proposed potential future oil field development would not result in a substantial increase in demand and would have less than significant impact on electrical energy resources.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact due to increased electricity consumption.

2.10 ENERGY AND MINERAL RESOURCES—FOSSIL FUELS

Please refer to EIR, Section 4.15 for an analysis of impacts to energy and mineral resources, including fossil fuels.

Potential Effects And Rationale Supporting Finding:

Future operations could increase fossil fuel (diesel, gasoline and natural gas) consumption and production. However, the future development could potentially produce more oil and gas than is currently produced at the Inglewood Oil Field. These products could be used to produce the fuels that are consumed at the field, and thus offset the increased consumption of these fuels. Therefore, the impact on availability of these fuels would be less than significant and would not result in a substantial increase in demand for fuels.

The facilities would not use any other mineral resources for the potential future development, nor would they occupy an area that contains known mineral resources (aside from oil and gas) in meaningful quantities.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on increased fossil fuel consumption and production.

2.11 ENVIRONMENTAL JUSTICE

Although not required by CEQA, the EIR contains a discussion of environmental justice. Please refer to EIR Section 4.16 for an analysis of Project impacts to environmental justice.

Potential Effects And Rationale Supporting Finding:

The potential future development could disproportionately impact minority populations as the study area has higher minority percentages than the County of Los Angeles, Culver City or the City of Los Angeles. It would not, however, result in impacts to poverty areas with higher poverty populations than areas of comparison. The study area in fact has a higher income level than the overall County of Los Angeles. The potential future development would not result in a substantial disproportionate decrease in the employment and economic base of minority and/or low-income populations in the area.

Finding:

For the foregoing reasons, the operation of the Project will have a less than significant impact on environmental justice.

SECTION 3 - POTENTIAL ENVIRONMENTAL IMPACTS THAT HAVE BEEN MITIGATED TO A LEVEL OF INSIGNIFICANCE

3.1 SAFETY AND RISK OF UPSET—PROPANE STORAGE AND LOADING

Please refer to EIR Section 4.1 for an analysis of impacts to safety and risk of upset, including propane storage and loading.

Potential Effect and Rationale for Finding:

The potential future development would present impacts to public safety from releases at the propane storage and loading facilities. Propane releases could impact the Kenneth Hahn State Recreation Area located to the east and north of the gas plant and the propane storage and truck loading/unloading area. As the risk profile curves are currently located in the amber region in EIR 4.1-4, this increase in risk would be considered a significant impact.

Risks associated with new equipment do not introduce risk to the public as they would not be located close enough to residences or transportation routes. However, as the location of the steam drive plant has not been definitively identified, this could also be a significant impact if the steam plant is located close to residences.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts associated with future oil operations to less than significant levels:

- R.1-1 Butane and natural gas liquids at the gas plant shall be blended with the crude oil to the maximum extent allowable to reduce the number of truck loading operations. Butane and natural gas liquids storage shall be limited to the maximum allowed by the Los Angeles County Fire Department under the CalARP program.

- R.1-2 The Operator shall fire-proof the propane and natural gas liquids bullets to reduce the frequency of catastrophic explosions and Boiling Liquid Expanding Vapor Explosions impacting the Kenneth Hahn State Recreation Area. The Operator shall either install four-hour rated fireproofing on the bullets or install two-hour rated fireproofing along with an automatic water deluge system.

- R.1-3 The Operator shall ensure that installation of the steam drive plant is at least 750 feet from the closest residences and that urea or equivalent, low toxicity material is used for NOx pollution abatement.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.2 SAFETY AND RISK OF UPSET—OIL SPILLS

Please refer to EIR Section 4.1 for an analysis of impacts to safety and risk of upset, including oil spills.

Potential Effect and Rationale for Finding:

The potential future development could introduce additional oil spill risks due to increased throughput and increased equipment inventories. Although the frequency of a release of crude oil leaving the site boundary and entering creeks, with proper drainage to a basin, is low, the increased throughputs and the additional tanks, piping, wellheads, pumps and other equipment at the facility would increase the volume and frequency of releases over current levels. In addition, as some areas of the field are not protected by basins (see March 2008 spill Table 2.8), some spills could directly enter creeks or street storm drains.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts associated with future oil operations to less than significant levels:

- R.2-1 Ensure that all existing oil tank areas at the field, where physically possible, and all new tank areas have secondary containment (berms and walls) that can contain at least 110% of the largest tank volume to prevent spills from entering the retention basin areas.

- R.2-2 The retention basins shall be adequately sited, inspected, maintained and operated to handle a 100-year storm event plus a potential spill of the volume of the largest oil tank that would drain into each basin.

- R.2-3 Ensure that all above ground piping containing crude oil or oily water are protected by basins or secondary containment (berms and walls) that can contain at least 110% of the worst case spill volume.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.3 AIR QUALITY—CONSTRUCTION

Please refer to EIR Section 4.2 for an analysis of air quality impacts, including impacts during construction.

Potential Effect and Rationale for Finding:

Construction activities would produce impacts exceeding the South Coast Air Quality Management District ("SCAQMD") criteria for construction emissions. The operation of well pad grading equipment, construction of the steam drive plant and the water treatment plant and oil cleaning plants would produce emissions from construction equipment. However, those

emissions individually would not exceed the SCAQMD regional thresholds for any pollutant during the peak day of construction.

The Inglewood Oil Field is located at the intersection of source receptor area 1, 2 and 3 (SCAQMD, 2003c). The estimated construction emissions associated with construction of the new units and drilling activities were compared to the SCAQMD adopted localized significance thresholds for CO, NOx, PM10, and PM2.5. Source area was assumed to be 1 acre, as per the estimated area disturbed by the steam drive or water treatment plant construction, and a receptor distance of 200 meters (based on distances to receptors from the steam drive plant). For the construction of the steam drive plant and the water treatment plant, the construction emissions individually would be below the localized significance thresholds (see Table 4.2.7). Therefore, less than significant air quality impacts would be expected.

Emissions associated with well pad grading would exceed the localized significance thresholds for NOx emissions.

If construction activities were to occur simultaneously, such as construction of the steam drive plant and the water treatment plant at the same time, then the peak day construction emissions would be additive and the emissions levels would exceed the significance thresholds. Under this scenario, the impacts would be considered significant.

Limiting the construction projects would prevent grading at multiple locations from cumulatively exceeding the significance thresholds. Implementation of fugitive dust mitigation measures would limit the impact of fugitive dust. Fugitive dust mitigation measures would reduce fugitive emissions by 60% overall. Note that PM10 emissions are below the applicable SCAQMD significance thresholds.

With the implementation of the above listed mitigation measures, impacts would be reduced to less than significant with mitigation.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- AQ.1-1 The operator shall limit construction of the steam drive plant and the water treatment plant/oil cleaning plant to different schedules so that construction activities do not overlap.

- AQ.1-2 The operator shall submit and implement a Fugitive Dust Control Plan that includes the SCAQMD mitigations for fugitive dust mitigation as per Rule 403 and the SCAQMD CEQA Guidelines. The Plan shall also address fugitive dust measures impacts to native habitats. Fugitive dust mitigation measures used in the plan should include the following:

    - Apply water every 4 hours to the area within 100 feet of a structure being demolished, to reduce vehicle trackout. (36% reduction)

- Use a gravel apron, 25 feet long by road width, to reduce mud/dirt trackout from unpaved truck exit routes. (46% reduction)

- Apply dust suppressants (e.g., polymer emulsion) to disturbed areas upon completion of demolition. (84% reduction)

- Apply water to disturbed soils after demolition is completed or at the end of each day of cleanup. (10% reduction)

- Prohibit demolition activities when wind speeds exceed 25 mph. (98% reduction)

- Apply water every 3 hours to disturbed areas within a construction site. (61% reduction)

- Require minimum soil moisture of 12% for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe. (69% reduction)

- Limit on-site vehicle speeds (on unpaved roads) to 15 mph by radar enforcement. (57% reduction)

- Replace ground cover in disturbed areas as quickly as possible. (5% reduction)

- All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches. (91% reduction)

- Install pipe-grid trackout-control device or a gravel bed trackout apron (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) to reduce mud/dirt trackout from unpaved truck exit routes. (46-80% reduction)

- Implement watering twice a day for industrial unpaved road. (55% reduction)

- Require construction of 3-sided enclosures with 50% porosity around storage piles. (75% reduction)

- Water storage piles by hand or apply cover when wind events are declared. (90% reduction)

- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days). (up to 80% reduction)

- AQ.1-3 All off-road diesel construction equipment shall be Tier III or better certified engines, or utilize other CARB verified emission control technologies to achieve the same level of emission reduction.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.4 AIR QUALITY—OPERATIONS

Please refer to EIR Section 4.2 for an analysis of air quality impacts, including impacts during operations.

Potential Effect and Rationale for Finding:

Operations at the Oil Field would produce impacts exceeding the SCAQMD criteria for operational emissions. Emissions associated with potential development operations would increase over the current emissions due to an increase in the crude oil throughout, fugitive emissions associated with new equipment and an increase in the use of combustion equipment associated with additional crude heaters, well drilling equipment and the steam generators.

Operational emissions would increase due to the addition of new equipment and the increased operations at existing equipment. Emissions of Volatile Organic Compounds (VOCs) and NOx, would increase above the SCAQMD regional significance criteria and would be considered a significant impact. Emissions of NOx, and particulate matter would increase above the SCAQMD localized significance criteria and would be considered a significant impact. Emissions of particulate matter, both PM10 and PM2.5, would be above the localized thresholds based on the SCAQMD lookup tables.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- AQ.2-1 The Oil Field Operator shall comply with all SCAQMD regulations, including but not limited to Regulation IV (prohibitions), Regulation XIII (New Source Review), Regulation XI (Source Specific Standards), Regulation XIV (New Source Review for Toxic Air Contaminants), Regulation XX (RECLAIM). The operator shall implement best available control technology (BACT) and obtain emission offsets or RECLAIM credits as required by SCAQMD Regulation XIII and/or Regulation XX for new and modified permitted emission sources. Emission offsets are required for all emission increases associated with stationary sources, thus, minimizing the impacts associated with emissions from stationary sources.

- AQ.2-2 The Oil Field Operator shall utilize a combined heat and power--type system or other energy efficient method, for steam production with the goal of reducing field-wide energy consumption (including electricity) and reducing or possibly eliminating the need for the use of steam generators.

- AQ.2-3 The Operator shall design the steam drive plant with a connection to the existing gas plant and eliminate the steam drive gas plant and flare.

- AQ.2-4 All drilling rig engines shall be Tier II or better certified engines, or utilize other CARB verified emission control technologies to achieve the same level of emission reduction.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.5 AIR QUALITY—ODORS

Please refer to EIR Section 4.2 for an analysis of air quality impacts, including impacts from odor events.

Potential Effect and Rationale for Finding:

Potential development operations at the Oil Field could result in odor events. Odor events could occur due to the addition of additional equipment, increased operations at existing equipment and increased drilling. Additional equipment would increase the number of components that could leak causing odors. Increased operations would increase the use of tanks, potentially leading to odor events from tank hatch lifting events. Increased drilling could increase the frequency of emissions from drilling muds during drilling operations. Some of these types of releases have caused notices of violation historically.

Required Mitigation Measures:

The following required mitigation measures will reduce the air quality impacts from odors to less than significant levels:

- AQ.3-1 The Operator shall have a gas buster and SCAQMD approved portable flare at the oil field and available for immediate use to circulate out and combust any gas encountered during drilling. The operator shall have connected and fully functioning a gas buster and SCAQMD approved portable flare for all wells that could penetrate the Nodular Shale to circulate out and combust any gas encountered during drilling. The flare shall be capable of recording the volume of gas that is flared. The operator shall report any flared gas from drilling to the Los Angeles County Fire Chief and the SCAQMD.

- AQ.3-2 The Operator shall install a detection system that will monitor vapor space on all crude oil tanks. The detection system shall be capable of monitoring pressure in the vapor space of the tanks and shall be capable of notifying the operator via an alarm when the pressure in the tanks gets within 10 % of the tank relief pressure. If the tank pressure exceeds the relief pressure, the Operator shall report the incident to the SCAQMD as a breakdown pursuant to Rule 430, and submit a report of the breakdown to the Los Angeles County Fire Chief and the SCAQMD, which shall detail the corrective actions the Operator shall take to avoid exceeding the tank relief pressure.

- AQ.3-3 The Operator shall develop an Odor Minimization Plan. The Odor Minimization Plan shall address odors from all oil field equipment, including wells and drilling operations, and the bioremediation farms. The Plan shall address issues such as

facility information, buffer zones, signs with contact information, logs of odor complaints, use of an odor suppressant when loading material into the bioremediation farms and the protocol for handling odor complaints.

- AQ.3-4 The Operator shall ensure all produced water and crude oil associated with production, processing and storage, except those used for sampling only, are contained within closed systems at all times.

- AQ.3-5 The Operator shall install a meteorological monitoring station at the Inglewood Oil Field that meets the requirements of the U.S. EPA guidelines on meteorological data as outlined in EPA Publication "Meteorological Monitoring Guidance for Regulatory Modeling Applications" (EPA-454/R-99-005) as published in February 2000.

- AQ.3-6 The Operator shall develop an Air Monitoring Plan. The Plan shall provide for the monitoring of total hydrocarbon vapors and hydrogen sulfide at each well drill and re-drilling site and total hydrocarbon vapors at the gas plant. At all times during drilling and redrilling operations, the Operator shall maintain monitoring equipment that shall monitor and digitally record the levels of hydrogen sulfide and total hydrocarbon vapors. Monitors shall be installed at the edge of the drill pad and around the outer edge of the gas plant. Such monitors shall provide automatic alarms that are audible or visible to the Operator of the drilling equipment for the drill rig monitors, and gas plant for the gas plant monitors, and shall be triggered by the detection of hydrogen sulfide or total hydrocarbon vapors. Alarm points shall be set at a maximum of 5 and 10 ppm H2S and 500 and 1,000 ppm hydrocarbons, with the higher level requiring shut-down of drilling or gas plant operations and notification to appropriate agencies, including Culver City Fire Department, Los Angeles County Fire Department and SCAQMD.

- AQ.3-7 The operator shall use an odor suppressant when loading or tilling material at the bio-farms such that no odor from the bio-farms can be detected at the edge of the oil field property.

- AQ.3-8 The operator shall use an odor suppressant spray system on the mud shaker tables for all drilling operations such that no odor can be detected at the edge of the oil field property.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.6 PUBLIC HEALTH—TOXIC AIR CONTAMINANTS

Please refer to EIR Section 4.3 for an analysis of Project impacts to public health, including from toxic air contaminants.

Potential Effect and Rationale for Finding:

Potential emissions of toxic air contaminants associated with future operations would produce a potential health risk that exceeds SCAQMD significance thresholds.

Toxic emissions associated with future construction and operations would increase over the current emissions due to an increase in the crude oil throughout, fugitive emissions associated with new equipment and an increase in combustion associated with existing heaters and new heaters and the new steam generators. In addition, more construction would be taking place at the field, including grading, additional drilling activities and new equipment construction. All of these construction activities utilize diesel engine power construction equipment, which emit toxic pollutants.

Based on the health risk assessment modeling results, potential health risks would be considered potentially significant. Sources that contributed the greatest to the high health risk levels mainly included diesel engines, especially those associated with the drilling of new wells.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- Several mitigation measures have been identified as part of the Air Quality Analysis. These mitigation measures, including AQ.1-1, AQ.1-2, AQ.2-1 and AQ.3-1 through AQ.3-5 would also reduce emissions of Toxic Air contaminants.

- PH.1-1 Install second generation heavy duty diesel catalysts, or equivalent technology, on all drill rig engines. The technology shall be capable of achieving 90 percent reductions for hydrocarbons, and particulate matter less than 10 microns (PM10). An example would include the Johnson Matthey CCRT® filter, which has achieved hydrocarbon and particulate emission controls in excess of 90 percent.

- PH.1-2 Install CARB-Verified Level 3 diesel catalysts on all diesel-powered construction equipment. The current list of CARB-Verified Level 3 diesel catalysts is located at http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm. Catalysts shall be capable of achieving 85% reduction for diesel particulate matter.

- PH.1-3 After five years of operation of the meteorological station at the oil field, the meteorological data shall be reviewed to determine if it could result in significant changes to the health risk assessment in this EIR. If there is the potential for significant changes, then the health risk assessment shall be updated, to determine if additional mitigation measures are required to keep the level of risk less than significant.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.7 PUBLIC HEALTH—SHORT TERM RISK FROM DRILLING NEW WELLS

Please refer to EIR Section 4.3 for an analysis of Project impacts to public health, including from short term risks from drilling new wells.

Potential Effect and Rationale for Finding:

Potential short-term health risk associated with exposure to emissions from drilling new wells could exceed acceptable health hazard indices. In evaluating the potential oil field development, emissions associated with drilling of new wells were allocated to each respective 10-acre area source since it is not known at this time exactly where each well will be drilled within the 10-acre area. Therefore, additional health risk assessment modeling was conducted to evaluate potential health risks in the immediate vicinity of well drilling activities. Drilling activities were addressed separately by conducting HARP modeling runs for cancer, acute and chronic risks that could occur at locations near drilling activity. This modeling was conducted to establish a recommended offset distance between the property boundary and drilling activity to avoid health risk impacts above threshold values. Since well drilling emissions at any given point are temporary in nature, potential property line offset distances were determined based on acute exposure to toxic air contaminants. All modeling also included the applicable mitigation measures proposed in the Air Quality section and PH.1-1 above.

Health risk assessment modeling results indicate that the acute hazard index of 1.0 would be exceeded at distances within 100 meters of well drilling activities. The Maximum hazard index associated with new well drilling was as high as 1.3 in the immediate vicinity of the drill rig, dropping to below 1.0 at approximately 400 feet from the drill rig.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- Several mitigation measures have been identified as part of the Air Quality Analysis and Impact PH.1. These mitigation measures, including AQ.1-1, AQ.1-2, AQ.2-1, AQ.3-1 through AQ.3-5 and PH.1-1 would also reduce emissions of Toxic Air contaminants.

- PH.2-1 When drilling new wells, maintain a distance of at least 400 feet from all areas where public exposure could occur. This would generally equate to maintaining a buffer of 400 feet from the Active Surface Field boundaries, except for areas where there would be no public exposure (i.e., areas inaccessible to the public either due to legal access limitations of rough terrain). Alternatively, drilling can occur to within 300 feet of areas where public exposure could occur as long as the drill rig generator is placed at least 500 feet from the drill rig and no closer than 300 feet from areas of public exposure. If it can be demonstrated through an updated health risk assessment addressing drilling rig emissions that a buffer distance can be reduced, then that buffer zone can be adjusted based on the results of the health risk assessment.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.8 GEOLOGICAL RESOURCES—SLOPE FAILURE AND UNCONSOLIDATED SEDIMENTS

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including slope failure and unconsolidated sediments.

Potential Effect and Rationale for Finding:

New well pad, road, pipeline and related infrastructure construction; infrastructure replacement activities; infrastructure abandonment activities; and/or oil spill remediation may cause surficial slope failure of unconsolidated sediments. Grading and excavations for proposed wells and related facilities, as well as pipeline construction, pipeline replacement activities, or soil remediation, would result in vegetation removal and creation of temporary steep slopes (i.e., steep slopes that are present only during grading activities, as allowed by the California Building Code until grading is completed and final slope gradients are created). Such activities could result in slope instability, especially following heavy rains, resulting in damage to components of oil field infrastructure and/or adjacent residences and businesses. PXP maintains a blanket grading permit, with the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, for grading up to 5,000 cubic yards. Because construction of most well pads would require less than 5,000 cubic yards of grading, slope stability impacts would be less than significant, as excavations and grading activities would be completed in accordance with established slope-related provisions included in the blanket grading permit. However, grading in excess of 5,000 cubic yards, as may be required for the proposed storage tanks, oil cleaning plant, and water treating facility, would result in more substantial alteration of the topography, thus resulting in possible slope failures due to temporarily oversteepened or improperly constructed slopes.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- GR.1-1 A site-specific, geotechnical investigation shall be completed for grading in excess of 5,000 cubic yards and for any grading that supports or impacts a critical facility, as determined by the Los Angeles County Director of Planning. The investigation shall be completed by a California-registered Professional Geologist and submitted to the Los Angeles County Director of Public Works, Geotechnical and Hazardous Materials Engineering Division, and Director of Planning, for review and approval, in conjunction with an application for a revised grading permit. Slope stability investigations shall include, but not be limited to a static (i.e., non-seismic related) slope stability analysis, dynamic (i.e., seismic related) slope stability analysis, differential settlement, and lateral spreading.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.9 GEOLOGICAL RESOURCES—SECONDARY OIL RECOVERY ACTIVITIES

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including from secondary oil recovery activities.

Potential Effect and Rationale for Finding:

Secondary oil recovery activities would result in soil settlement/subsidence, ground uplift, and/or reactivate existing fractures/faults, which could substantially damage components of oil field infrastructure and/or adjacent residences and businesses, or could result in gas migration.

Oil production and associated water production could increase at the Inglewood Oil Field over the next 20 years. Extraction of large volumes of oil and water could potentially result in ground subsidence. Injection of the produced water would have beneficial impacts with respect to subsidence, as the potential for subsidence decreases with increased water flooding. Researchers from the U.S. Geological Survey indicated as recently as 2001 that portions of the Baldwin Hills are actually uplifting as a result of secondary recovery-related, waterflood operations. However, secondary recovery operations could also cause ground uplift/rebound-related structural damage, as well as potentially trigger earthquakes and/or trigger reactivation of surface cracks/faults if the injection pressures were to exceed the fracture pressures of the injection reservoirs. The data provided in Table 4.4.1 of the EIR shows that the current water injection pressures do not exceed fracture pressures.

The California Division of Oil, Gas, and Geothermal Resources require development of a fieldwide repressuring plan to abate potential subsidence as a result of oil, gas, water, and sand withdrawal. In addition, as part of a requisite injection plan, the California Division of Oil, Gas, and Geothermal Resources mandates that water injection pressures do not exceed fracture pressures, thereby minimizing the potential for earthquakes and surface ground cracking.

Therefore, the potential for subsidence related damage to overlying structures and/or infrastructure, as a result of continued oil withdrawal, is low but the impacts are still considered potentially significant. Given the fact that injection pressures are maintained below the fracture pressures of the injection zones the potential for induced earthquakes is low and impacts are considered less than significant. Small earthquakes, which occur regularly in the Project area, are common throughout the greater Los Angeles area, as well as the remainder of southern California.

In addition, potential subsidence induced ground cracking provides avenues for gas migration to the surface. As part of the EIR process over 90 soil gas vapor samples were taken throughout the oil field. The majority of these samples showed that the soil gas vapor concentrations were extremely low (less than 0.2 ppm). For two of the sample points high concentrations of soil gas was detected, which were related to leaking idle wells, which have since been abandoned by the operator. In addition, 10 percent of the abandoned wells within the oil field were surveyed for leaking gas, and none were found to be leaking. The results of these tests are provided in Appendix E of the EIR. These results indicate that gas migration at the oil field does not appear to be an issue. The production zones at the oil field are water driven, not gas driven, and there is

very little free gas associated with the reservoirs. As such, there is a minimal source of gas that could migrate to the surface along oil/gas wells, faults/fractures, or other permeable features.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

Subsidence Related Mitigation

- GR.2-1 Accumulated ground movement (subsidence and/or uplift/rebound) (since post-Baldwin Hills Reservoir failure studies) shall be measured in the vicinity of and in the Inglewood Oil Field, using repeat pass Differentially Interferometric Synthetic Aperture Radar technology. The survey measurement parameters, including fixed reflector locations (as appropriate), shall be established in accordance with a plan for determining the accumulated ground movement that is acceptable to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, and California Division of Oil, Gas, and Geothermal Resources. The plan shall include survey points within the vicinity of and within the Inglewood Oil Field. The results shall be forwarded to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, and California Division of Oil, Gas, and Geothermal Resources.

- GR.2-2 Using the results of the Differentially Interferometric Synthetic Aperture Radar study as a baseline condition, ground movement (subsidence and/or uplift) monitoring shall be completed every twelve months in the vicinity of and in the Inglewood Oil Field. Surveys shall be completed following all provisions of a plan that is acceptable to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, and the California Division of Oil, Gas, and Geothermal Resources. Surveying for both vertical and horizontal ground movement shall be completed by a California Licensed Surveyor, along the perimeter and throughout the interior of the oil field, utilizing high precision Global Positioning System technology, in combination with a network of ground stations.

  Surveying shall be used to monitor ground subsidence and aid in balancing the oil extraction with groundwater injection volumes and pressures. The survey results shall be analyzed in relation to oil field activities, such as production, steam injection, and waterflooding, taking into consideration individual oil producing zones, injection schedules, rates, volume, and pressure. The analysis shall be completed in collaboration by a California-registered Professional Petroleum Engineer, Registered Geotechnical Engineer, and Certified Engineering Geologist. The annual monitoring survey results shall be forwarded to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, and the California Division of Oil, Gas, and Geothermal Resources. If requested by the California Division of Oil, Gas, and Geothermal Resources or the Director of Public Works, the Operator shall make modifications to the ground movement monitoring plan.

- GR.2-3 In the event that ground movement monitoring indicates that on-going ground movement, equal to or greater than 0.6 inch at any given location, or a lesser value determined by the Director of Public Works, in an upward or downward direction, is occurring in the vicinity of or in the Inglewood Oil Field, and it is determined that the Operator's operations are the cause, the California Division of Oil, Gas, and Geothermal Resources, acting in consultation with the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division and the Oil Field Operator, shall determine if damage has occurred and evaluate the Operator's fluid injection and withdrawal rates to determine where adjustments to these rates may alleviate the ground movement. The Operator shall implement whatever adjustments in the rates of fluid injection and/or withdrawal that the California Division of Oil, Gas, and Geothermal Resources determines are necessary and appropriate to alleviate any damage.

Earthquake Related Mitigation

- GR.2-4 Injection pressures associated with secondary recovery operations (i.e., water flooding) shall not exceed reservoir fracture pressures as specified in California Code of Regulations Title 14, Division 2, Section 1724.10, and as approved by the California Division of Oil, Gas, and Geothermal Resources.

Gas Migration Related Mitigation

- GR.2-5 The Operator shall conduct annual hydrocarbon vapor testing of areas within the Oil Field that contain Abandoned Wells. The testing shall be done using a soil Gas vapor probe, or another method approved by the Director. The results of the testing shall be submitted to the Director and DOGGR on an annual basis. Abandoned Wells that are found to be leaking hydrocarbons that could affect health and safety shall be reported to the Director and DOGGR within 24-hours of the Abandoned Well Test. If directed by DOGGR, the Operator shall re-abandon the Well in accordance with DOGGR rules and regulations. If the test results for an Abandoned Well area is at or below the background levels for two (2) consecutive years that area shall thereafter be tested every five (5) years.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.10 GEOLOGICAL RESOURCES—EROSION AND SILTATION OF WATERWAYS

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including erosion and siltation of waterways.

Potential Effects And Rationale Supporting Finding:

New well pad, road, pipeline, and related infrastructure construction; infrastructure replacement activities; infrastructure abandonment activities; and/or oil spill remediation may cause an increased potential for short-term erosion and sedimentation of local drainages and nearby Ballona Creek, located approximately 0.2 mile west of the active surface field boundary, at the

closest point. In addition, during the life of the Inglewood Oil Field, existing drainage channels have been enlarged and new gullies have formed to accommodate heavy storm events. Natural erosion in these areas would contribute to the sediment load during future oil field operations.

Surface runoff associated with on-going construction activities during the projected life of the Inglewood Oil Field is covered under Sections A and B of National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002 (California RWQCB 2001). Operational discharges are subject to the requirements of NPDES permit No. CA0057827.

Oil field construction activities are completed in accordance with provisions of an NPDES-mandated Storm Water Pollution Prevention Plan (SWPPP) (PXP 2006). Construction activities are routinely scheduled for the dry season to minimize the potential for heavy loads to storm water. Each grading or excavation activity is evaluated for its potential to cause erosion, due to its location in proximity to drainage areas. In areas with high potential for erosion that could impact these drainage areas, Best Management Practices identified in the Storm Water Pollution Prevention Plan would be implemented. In the absence of an updated, Project-specific Erosion Control Plan, impacts associated with construction induced erosion and sedimentation of local drainages and nearby Ballona Creek would still be considered potentially significant.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- GR.5-1 The construction Stormwater Pollution Prevention Plan required by NPDES General Permit No. CAS00002 shall be updated prior to new construction activities as required by the Los Angeles Regional Water Quality Control Board.

- GR.5-2 Prior to new construction, the Oil Field Operator shall develop an Erosion Control Plan that details the Best Management Practices that will be used on the site to control erosion. The plan, which shall be delivered to the Los Angeles County Director of Planning for review and approval, should include measures such as:

    - Graded areas shall be stabilized with riprap (i.e., crushed stone) or other ground cover as soon as grading is completed. The surface of slopes shall be roughened during the construction period to retain water, increase infiltration, and facilitate establishing vegetation. Tracked machinery shall be operated up and down (parallel with) slopes to leave horizontal (perpendicular) depressions in the soil, which run across the slope, on the contour.

    - Slope breaks, such as diversions, benches, or contour furrows shall be constructed to reduce the length of cut- and fill-slopes, thus limiting sheet and rill erosion and preventing gully erosion.

- Sediment barriers shall be used around construction areas to retain soil particles on-site and reduce surface runoff velocities during rainfall events. Sediment barriers could include straw bales, silt fences, and gravel and earth berms. Silt fences shall be placed on slope contours in areas where shallow overland flow is anticipated.

- Temporary and permanent drainages shall be employed, as necessary, to reduce slope erosion and prevent damage to construction areas. Sheet flow across or toward a disturbed area shall be intercepted and conveyed to a low to moderate gradient (1 to 5 percent slope) sediment basin, erosion-resistant drainage channel, or a level, well-vegetated area. Drainages would include swales, diversion dikes, and slope drains.

- Waterbars, rolling dips, and outsloping roads shall be constructed as part of new road construction to disperse runoff and reduce the erosive forces associated with concentrated flows.

- Newly exposed soil areas, especially sloped areas, shall be revegetated using native vegetation, in consultation with local biologists familiar with native species that would best control erosion, while maintaining fire standards at the site. The effectiveness of the revegetation shall be monitored and measured by sampling stormwater flowing across the revegetation area in its present condition and then annually (three rain events a year) subsequent to revegetation.

In addition, see mitigation measure WR.3-1 (Water Resources section) regarding potential upgrades to existing stormwater retention basins.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.11 GEOLOGICAL RESOURCES— PALEONTOLOGICAL IMPACTS

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including paleontological impacts.

Potential Effects And Rationale Supporting Finding:

New well pad, road, pipeline, and related infrastructure grading and construction may cause direct or indirect destruction of a unique paleontological resource.

Near-surface sediments within the active surface field boundary consist primarily of the early to middle Pleistocene, marine San Pedro Formation and the upper Pleistocene, nonmarine to shallow marine Lakewood Formation. These near-surface sediments are old enough to contain fossils and would be subject to potential disturbance during future oil field development; therefore, potential paleontological impacts are limited to these formations. The Holocene alluvium is not old enough to contain fossils and the formations underlying the Lakewood and

San Pedro formations would not be disturbed as a result of the Project and are therefore not discussed.

Pleistocene fossils are known from research and construction-related excavations in the Los Angeles Basin, within the Lakewood, San Pedro, and related formations. Remains of invertebrates such as bivalves, gastropods, sand dollars, barnacles, and crabs are common. Less common, but more significant, are the remains of marine vertebrates such as bony fish, sharks, whales, dolphins, and seals. In addition, Rancholabrean-type terrestrial animals such as elephants, horses, bison, camels, saber-tooth cats, deer, and sloths are known from these sediments. The potential exists to encounter similar fossils during ground-disturbing activities whenever these sediments are encountered.

Required Mitigation Measures:

The following required mitigation measure will reduce impacts to less than significant levels:

- GR.7-1 The Los Angeles County Director of Planning shall verify that a paleontologist, who is listed on the County of Los Angeles list of certified paleontologists, has been retained and shall be on site during all rough grading and other significant ground disturbing activities in paleontologically sensitive sediments. The sensitive sediments that have been identified within the project include the Lower to Middle Pleistocene San Pedro Formation and the Middle to Upper Pleistocene Lakewood Formation. A paleontologist will not be required on site if excavation is only occurring in artificial fill and/or Holocene alluvium. The paleontologist shall be on site during rough grading involving less than 5,000 cubic yards (i.e., under the established blanket grading permit) or greater than 5,000 cubic yards.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.12 BIOLOGICAL RESOURCES—HABITAT

Please refer to EIR Section 4.5 for an analysis of impacts to biological resources, including habitat.

Potential Effect and Rationale for Finding:

Clearing, grading, construction and operations activities have the potential to have a substantial adverse effect on riparian habitat and other sensitive natural communities, including California sagebrush scrub, coyote brush scrub, and oak woodlands.

Riparian habitats and oak woodlands are identified as important habitats in the County of Los Angeles. California sagebrush scrub and coyote brush scrub habitats are considered sensitive natural communities that have the potential to support sensitive plant and wildlife species or wildlife corridors (discussed in Impact BR.4). On the project site, riparian habitats are restricted to a few remnant drainages. Interior live oak woodland habitat was identified in one valley in the northwest portion of the site. California sagebrush scrub and coyote brush scrub are found

throughout the site, although large contiguous areas of these habitat types are primarily found outside of highly disturbed areas and adjacent to other designated open space areas, such as to the northwest, north and northeast of the oil field. Although the low quality riparian and scrub habitats present on the site support less diversity of native plant species, they still provide function and value to wildlife and would be considered sensitive natural communities if the functions and values are such that they support sensitive wildlife species or wildlife corridors. Clearing, grading and construction activities that result in removal of riparian, California sagebrush scrub, coyote brush scrub, and oak woodland habitat is considered a potentially significant impact to biological resources. In addition a major oil spill could also result in loss of sensitive natural communities (discussed in Impact BR. 2-2).

Construction and operation activities have the potential to indirectly affect sensitive natural communities by promoting the establishment and spread of non-native invasive plant species which can degrade higher quality habitats. The potential for this to occur is evidenced by the amount and location of degraded scrub communities already present on the project site. Most of the degraded communities are adjacent to or surrounded by disturbed or high use areas. The movement of equipment and personnel around the site helps spread non-native invasive plant species from one area to another and these species readily establish in areas that have been cleared or otherwise disturbed. The degradation of good quality natural habitats at a minimum reduces the function and value of those habitats and ultimately may result in a loss of that habitat type, resulting in a potentially significant impact to biological resources.

Quantifying the total extent of disturbance to habitat resulting from future oil development is uncertain. However, as an example of past levels of disturbance, PXP reports in their application data that in the last two years, a total of 40 new wells were proposed to be installed which would have resulted in a potential loss of 0.3 acres of habitat. PXP reports that only 16 new wells were actually installed on the property with 0 acres disturbed. Future oil development on the site over the next 20 years (approximated at 50 new wells per year) is expected to disturb about 8 acres of previously undisturbed habitat.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- BR.1-1 Preparation and Implementation of a Special Status Species and Habitat Protection Plan. So that future oil and gas production activities avoid or minimize impacts on riparian habitat and other natural communities present on the project site, including California sagebrush scrub, coyote brush scrub, and oak woodlands the applicant shall prepare a Special Status Species and Habitat Protection Plan. The purpose of the plan is to ensure that native plant communities and wildlife habitats currently present on the site are preserved and are not degraded by either oil and gas production activities or the spread of invasive plant species that are present on the project site. The plan, at a minimum, shall include:

    - A map depicting the natural plant communities on the project site that are to be protected including interior live oak woodland, riparian habitats, scrub habitats, and any areas identified as having the potential to support sensitive plant or wildlife

species, including individual or groups of trees that could be used as nesting habitat. The map may be refined if surveys determine the presence/absence of sensitive species or a re-classification of plant communities. The map shall be used to identify areas within the project area where impacts should be avoided, if feasible, or minimized, if avoidance is not feasible.

- A requirement to use native plants for any future landscaping projects to prevent the introduction of new non-native invasive species into the project area and to support the existing native habitats present on the site. Landscaping projects in areas adjacent to existing native habitats or areas that are identified as supporting sensitive plant species shall use native plants propagated from local plant materials exclusively to prevent degradation of native habitats in the project area, including degradation associated with genetic pollution of local genotypes.

- A schedule that includes periodic monitoring of areas identified as sensitive natural communities to determine if non-native species are encroaching or otherwise causing degradation of these habitat types. Periodic monitoring shall be done at least once every 3 years, or more frequent if deemed necessary. Appropriate remedial measures for control of invasive plant species shall be identified and implemented if it is determined that invasive plant species are causing degradation or loss of functions and values of areas identified as sensitive natural communities.

- The Special Status Species and Habitat Protection Plan shall be prepared and protection measures in place prior to implementation of any future oil and gas production activities.

- BR.1-2 Provide restoration/compensation for impacts to native plant communities and wildlife habitats.

  - If future oil and gas production activities will result in an impact to sensitive natural habitats including riparian areas, California sagebrush scrub, coyote brush scrub, oak woodland, or any area identified as having the potential to support sensitive plant or animal species, the following shall be implemented: Prior to clearing and grading, the oil field operator shall have a qualified restoration biologist document the community type and acreage of vegetation subject to disturbance. Impacts to trees greater than 3 inches diameter breast height (dbh) including any sensitive trees (i.e., California walnut, oaks, and suitable nest trees) will be documented by identifying the species, number subject to disturbance, and dbh.

  - A Habitat Restoration and Revegetation Plan shall be prepared by a qualified restoration specialist (approved by the County) with expertise in southern California ecosystems and revegetation techniques. On-site restoration is preferred, but off-site may be considered if on-site areas are not available. Off-site restoration should be limited to areas within the Baldwin Hills Park Master Plan, as much as feasible.

- At a minimum, the Habitat Restoration and Revegetation Plan shall include the following:

    a. A map or maps depicting the location of the mitigation site and the type of mitigation to be performed (i.e., onsite or off-site revegetation, enhancement, or acquisition of lands).

    b. A list of native plant species to be used including details concerning the salvaging, propagation and replanting of native plant species, including special status plant species, propagated from local genetic sources.

    c. A schematic depicting the planting area.

    d. Planting specifications including methods for seeding, planting of container stock or other plant materials, and planting schedule.

    e. A description of the irrigation system, if used;

    f. Monitoring procedures and minimum success criteria for habitat restoration efforts. The success criteria shall consider the level of disturbance and condition of the adjacent habitats. Success criteria shall also consider the functions and values of the habitat being replaced. Monitoring shall continue for a minimum of 5 years, or until success criteria are met.

    g. Appropriate remedial measures, such as replanting, erosion control or control of invasive plant species, if it is determined that success criteria are not being met.

    h. Monitoring shall extend beyond the 5-year period if criteria are not being met unless otherwise noted by the County. If a catastrophic event occurs, such as fire, there will be a one-time replacement. If a second catastrophic event occurs, no replanting is required.

Implementation of BR.1-1 and BR.1-2 would minimize and offset the loss of habitats associated with the future oil development. Native habitat restoration could be implemented on the project site either through revegetation of disturbed (non-vegetated) or weed-dominated areas or enhancement of degraded natural areas, including removal of non-native species and supplemental planting to increase plant diversity. The Biota of Baldwin Hills (NHMLACF 2001) includes recommendations for setting priorities for restoration of degraded native habitats that considers the potential for restoration to be successful (restoration potential) and the location of the area in relation to other habitats (habitat connectivity). Degraded habitats that may be subject to restoration are assigned a priority rating based on the following:

- Priority 1: Existing habitat that is somewhat degraded with considerable non-native –plant species but also contains a diversity of native plant species; the soils and natural topography are somewhat intact, and the habitat is of sufficient size that edge effects would be minor to moderate.

- Priority 2: Existing habitat that is degraded and is dominated by non-native plant species and presence and diversity of native plant species is low; the soils and natural topography are highly modified; however, the area is identified as an important linkage between two or more areas of existing healthy habitat or areas high restoration potential and restoration would improve overall habitat function in a larger area or habitat connectivity.

- Priority 3: Existing habitat is degraded and is dominated by non-native plant species and presence and diversity of native plant species is low; the soils and natural topography are highly modified; the area is not identified as an important area for habitat connectivity.

- Low Priority: Existing habitat is highly degraded and is not vegetated or is dominated by non-native plant species or landscaping; the area is not adjacent to healthy habitat or habit with high restoration potential.

The recommendations provided in the Biota of Baldwin Hills (NHMLACF 2001) suggest that mitigation (restoration or revegetation) consider the above priorities in determining where compensatory mitigation is to be conducted and also suggest that mitigation ratios may be modified so that Priority 1 and 2 areas would get primary consideration for restoration projects (i.e., a lower mitigation ratio would be required if areas selected for restoration contribute to the to the overall function an value of the native habitats remaining in the project area).

- BR.1-3 The following minimum mitigation ratios shall be included in the Habitat Restoration and Revegetation Plan (BR.1-2) and are recommended to replace or offset loss of sensitive habitat associated with future oil development.

    - 1:1 - For each acre of coastal sagebrush scrub or coyote bush scrub, lost, the applicant will implement appropriate restoration or enhancement techniques in areas meeting the description of Priority 1 or Priority 2 area.

    - 2:1 - For each acre of riparian scrub or oak woodland lost, the applicant will implement appropriate restoration or enhancement techniques in areas meeting the description of Priority 1 or Priority 2 areas.

The purpose of the mitigation ratio is twofold: 1) to offset the temporal loss of high quality habitats, which can take several years to replace; and 2) to encourage the restoration and enhancement of Priority 1 and 2 areas within the Baldwin Hills Parks Master Plan Area. The mitigation ratios presented above represent the minimum requirements and the mitigation ratio may be increased if the affected habitat supports sensitive plant or animal species or if revegetation efforts are not or minimally successful. Determination of mitigation ratio requirements will depend on the affected resource (i.e., status of sensitive plant or animal species, wetlands or riparian areas) and will ultimately be determined by the regulatory agencies during the permit process (i.e., Los Angeles County, CDFG. USFWS, or USACE).

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.13 BIOLOGICAL RESOURCES—WILDLIFE

Please refer to EIR Section 4.5 for an analysis of impacts to biological resources, including wildlife.

Potential Effect and Rationale for Finding:

Construction and drilling activities have the potential to have a substantial adverse effect on species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the CDFG or USFWS.

No federal or state-listed rare, threatened or endangered plant species were found in areas adjacent the project site during the two-day 2007 SAIC site visit. Several Federal and State-listed species occur in coastal salt marsh and coastal dune habitats that are not present on the project site (refer to Table 4.5.4), although these habitats are present in the Ballona wetlands downstream. Other Federal and State-listed plant species are limited in distribution and typically occur on specialized soils, which are not reported from the project site. However, focused surveys for sensitive plant species have not been conducted within the Inglewood Oil Field and sensitive plant species, including Federal or state-listed plant species, may be present particularly in remote areas that are have not been significantly disturbed by past activities or invasion by non-native weedy species. Braunton's milk vetch (federally-listed endangered) and Lyon's pentachaeta (federally and state-listed endangered) both occur in coastal scrub habitats and, although unlikely, their presence on the project site cannot be ruled out. In addition, the scrub habitats on the project site have a potential to support other (non-listed) sensitive plant species. South coast saltscale, Davidson's salt scale, or rock lettuce. Southern tarplant has been known to occur in disturbed areas that have been seasonally saturated or ponded. Southern California black walnut may occur on the site either as a planted tree or a remnant from a woodland community. These species represent those that may occur based on current sensitive species lists and are not intended to represent the only species that may be present on the project site. Since the project will occur over several years, it is likely that other additional plant could be added to the list or may be found in the project vicinity.

Although no surveys were conducted for federal or state-listed wildlife species on the project site for the EIR, there is very little potential for their occurrence due to the high level of disturbance and the extensive urban development surrounding the project site. The peregrine falcon is the only state or federally listed wildlife species recently documented to occur in the Baldwin Hills area and is unlikely to be affected by future oil development on the site because this species is expected to be present on the project site on an infrequent basis. No other habitat for any federally or state-listed wildlife species has been identified in previous studies and surveys of the area. Based on lack or limited availability of suitable habitat on the project site, future oil and gas development would not directly affect any part of the population of a Federal or State-listed plant or animal species. Several Federal and State-listed plant and animal species and other sensitive plant species do occur in the Ballona Wetlands, downstream of the project site, and

could be indirectly affected by future oil and gas development if sediment or other potential pollutants were to move offsite through the drainage system and reach Ballona wetlands, resulting in a potentially significant impact on these resources. However, current construction and operation practices use BMPs to prevent potential pollutants and sediment from leaving the site (Impact WR.1), which reduces potential to biological resources from construction.

Other sensitive wildlife resources have been reported from near the project area and have the potential to be present on the project site or to be affected by future oil and gas development activities:

- A Cooper's hawk nest is known to occur north of the project site in an adjacent residential area and suitable nesting habitat is present on the project site.

- Several raptor species and other bird species protected under the Migratory Bird Treaty Act, including the red-tailed hawk, red shouldered hawk and American kestrel utilize the trees onsite for nesting and perch sites.

- Project-related activities could result in damage and removal of native and non-native trees and shrubs that provide cover, roosting and nesting habitat for migratory birds as well as common bird species.

- Noise, lighting and dust generated during clearing, grading, construction and drilling could impact sensitive bird species.

- The Los Angeles Pocket Mouse has the potential to occupy coastal sage scrub habitats on the project site and could be impacted during future oil and gas development activities which result in a loss of this habitat.

- Reproductive success of avian species could be adversely affected by construction and drilling activities during the nesting season. Nests could be lost during vegetation clearing, and noise and human activities during construction and operations could cause birds nesting in adjacent habitat to abandon their nests, resulting in a potentially significant impact to special status bird species.

- The coast horned lizard, a California Species of Special Concern, could be directly impacted by vegetation removal and ground disturbance in occupied habitat. Mortality or injury to individuals of Coast horned lizard would be considered a potentially significant impact to this special status species.

Project construction, grading and operations during future oil development activities have the potential to directly and indirectly impact special status species both on-site (if present) and in areas adjacent to or downstream of the project site. Although the impacts are likely to be minor due to the marginal quality of the habitat on-site and implementation of BMPs that would protect water quality as well as downstream biological resources, if future oil development results in a loss of individuals or habitat or a reduction in reproductive success for a special status species, it would be considered a significant impact on biological resources.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- BR.2-1a Conduct surveys for sensitive plants and avoid populations of federal and state-listed plant species.

    - Prior to vegetation removal or ground disturbance activities, surveys shall be conducted for sensitive plant species in accordance with protocols established by the USFWS, CDFG, or CNPS. Surveys shall be conducted during the appropriate blooming period(s) by a qualified County-approved plant ecologist/botanist. All federal or state-listed plant species shall be avoided, if present. Removal or damage to any federal or state-listed plan species would only be authorized through the context of a Biological Opinion or CDFG take authorization.

    - In consultation with the agency approved plant ecologist/botanist, the project shall be redesigned, constructed and operated in such a way as to avoid direct and indirect impacts to individuals or populations of federal or state-listed plant species found during surveys. Populations of federal or state-listed plant species located within temporary construction areas shall be fenced or flagged for avoidance prior to construction and a biological monitor shall be present to ensure compliance with off-limit areas.

    - Prior to site grading, any populations of federal-or state-listed plant species found during surveys shall be protected by a buffer zone. The buffer shall be of sufficient size to eliminate potential disturbance to the plants from human activity or any other type of disturbance, such as trampling, dust or soil erosion. The size of the buffer will depend on the proposed use of immediate adjacent lands and considers the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, edaphic physical and chemical characteristics). At a minimum, the buffer for tree and shrub species shall be equal to twice the drip line (i.e., two times the distance from the trunk to the canopy edge). The buffer for herbaceous species shall be, at a minimum, 50 feet from the perimeter of the population or individual. A smaller buffer may be established provided there are adequate measures in place to avoid take of the species and with the approval of the USFWS, CDFG, and County.

- BR.2-1b Avoid or minimize disturbance to other (non-listed) sensitive plants found during project surveys.

    - Removal or damage to individuals or populations of other sensitive plant species found during surveys shall be avoided or minimized. This includes, but is not limited to, south coast saltscale, Davidson's salt scale, rock lettuce, southern tarplant, and Southern California black walnut.

- For sites where removal of individuals of non-list sensitive species cannot be avoided, salvage and propagate individual plants and/or seed and incorporate into the Habitat Restoration and Revegetation Plan (Mitigation Measure BR.1-2).

- Removal, salvage, and restoration of non-listed sensitive plant species shall be done under the supervision of a qualified agency approved plant ecologist/botanist and in a manner that ensures the overall population of the species is not degraded to a point where it is no longer sustainable (e.g., in general, the impact shall not result in removal of more than 10 percent of a discrete population and restoration shall ensure the population is returned to pre-project numbers).

- BR.2-2 Conduct pre-construction surveys and monitoring for breeding/nesting birds.

  - The Applicant shall contract with an agency-approved qualified biologist who shall conduct pre-construction bird surveys and monitoring during construction in areas that would require the direct removal of coastal scrub vegetation, native and non-native trees, or other areas where suitable nesting habitat for Coastal cactus wren or other sensitive and migratory bird species may occur. Surveys shall be conducted within 500 feet of any construction activities (i.e., staging areas, drilling sites, and access road locations). The surveys shall be conducted during the appropriate time of year (as follows) and shall focus on breeding behavior and nesting locations: (a) Surveys for raptors shall be conducted shall be conducted for all areas from February 1 to August 31 and (b) Surveys for sensitive/common bird species shall be conducted from March 15 to September 15.

  - If breeding birds with active nests are found, the biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The 300-foot buffer may be adjusted to reflect existing conditions including ambient noise and disturbance with the approval of the County and CDFG.

  - The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the within the buffer(s) until the nesting cycle is complete or the nest fails.

  - The biological monitor shall be responsible for documenting the results of the surveys and the ongoing monitoring and will provide a copy of the monitoring reports for impact areas to the County.

  - Removal of native or non-native trees and riparian scrub vegetation shall be scheduled, as feasible, for removal outside the nesting season (generally March 1 to August 31) to avoid impacts to nesting birds. Removal should occur at ground level and leave the roots in place to facilitate restoration.

- If avoidance or removal of trees during the recommended periods (March 1 to August 31) is not feasible, the County-approved biologist shall perform a survey to ensure that no nesting birds are present prior to vegetation removal.

- If for any reason a nest must be removed during the nesting season, the oil field operator shall provide written documentation demonstrating concurrence from the USFWS and CDFG authorizing the nest relocation and a written report documenting the relocation efforts. The report shall include the species, the nest location, what actions were taken to avoid moving the nest, the number and condition of the eggs taken from the nest, the location of where the eggs are incubated, the survival rate, the location of nests where the chicks are relocated and whether the birds were accepted by the adopted parent.

- BR.2-3 Conduct focused surveys for sensitive wildlife and implement monitoring, avoidance, and impact minimization methods. The Applicant shall contract with a qualified County-approved biologist who shall conduct pre-construction surveys for sensitive wildlife species, including coast horned lizards, in all areas that support habitat for sensitive wildlife species.

    - If sensitive wildlife species are detected in or adjacent to the proposed work area, no work shall be conducted until the biologist has inspected and cleared these areas.

    - In areas where native vegetation is to be removed, an agency approved biological monitor shall be present during vegetation removal to ensure that wildlife (i.e. coast horned lizard and other common wildlife) species are not present and not harmed. The biologist shall have authority to stop work if threats to the species are identified during monitoring.

    - Measures requiring lizard and other wildlife exclusionary fencing in areas where coast horned lizards are found; lizard exclusion fences shall be erected around proposed disturbance area before ground disturbance and individuals shall be removed from the project area. The biological monitor shall clear the work area every morning before work begins to confirm the absence of coast horned lizard.

    - If individual animals are found, they shall be relocated to suitable habitat outside the project area.

    - Procedures for timely re-establishment of vegetation that replicate the sensitive species habitat removed or disturbed, including special status plant species, (or, in the case of degraded habitats dominated by non-native species, replaces them with suitable native species).

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.14 BIOLOGICAL RESOURCES—OIL LEAK IMPACT ON SPECIES

Please refer to EIR Section 4.5 for an analysis of impacts to biological resources, including possible oil ruptures or leaks impacts on candidate, sensitive, or special status species.

Potential Effect and Rationale for Finding:

A rupture or leak from oil wells, pipelines, or other oil field related infrastructure has the potential to result in a substantial adverse effect on species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- Safety and Risk of Upset Mitigation Measures R.2-1 (secondary containment around tanks), R.2-2 (design of the retention basins), Mitigation Measures WR.1-2 (Spill Prevention, Control and Countermeasure Plan), and GR.4-2 (Emergency Response Action Plan) would contribute in limiting the potential for offsite spills and associated significant impacts. Implementation of and Mitigation Measures GR.3-4 (seismic assessment of tanks) and GR.4-1 (Pipeline Management Plan) would serve to reduce the likelihood of an oil spill occurring. Though unlikely, where a spill or clean up has the potential to result in impacts on sensitive species or the loss of sensitive species habitat, implementing the following would further reduce impacts on biological resources.

- BR.2-4 The Emergency Response Action Plan shall be revised and updated to address protection of sensitive biological resources and revegetation of any areas disturbed during an oil spill or cleanup activities. These measures shall also be included in the Special Status Species and Habitat Protection Plan (BR.1-1). The revised Emergency Response Action Plan and Special Status Species and Habitat Protection Plan shall, at a minimum, include:

    - Specific measures to avoid impacts on native vegetation and wildlife habitats, plant and animal species, and environmentally sensitive habitat areas during oil spill response and cleanup operations. The plans shall specifically address measures to 1) prevent an oil spill from entering Ballona Creek and 2) if a spill does enter Ballona Creek, includes measures to prevent a spill from reaching the Ballona Wetlands. The plan shall describe the worst case scenario for maximum oil spill during a period of high flows in Ballona Creek coupled with an extreme high tide event at the Ballona Wetlands.

    - Low-impact site-specific techniques such as hand-cutting contaminated vegetation and using low-pressure water flushing from boats shall be specified to

remove spilled material from particularly sensitive wildlife habitats, such as coastal estuaries (i.e., Ballona wetlands), because procedures such as shoveling, bulldozing, raking, and drag-lining can cause more damage to a sensitive habitat than the oil spill itself. The Emergency Response Action Plan shall evaluate the non-clean up option for ecologically vulnerable habitats such as coastal estuaries.

- When habitat disturbance cannot be avoided, the Emergency Response Action Plan shall provide stipulations for development and implementation of site-specific habitat restoration plans and other site-specific and species-specific measures appropriate for mitigating impacts on local populations of sensitive wildlife species and to restore native plant and animal communities to pre-spill conditions. Access and egress points, staging areas, and material stockpile areas that avoid sensitive habitat areas shall be identified. The Emergency Response Action Plan shall include species- and site-specific procedures for collection, transportation and treatment of oiled wildlife, particularly for sensitive species.

- Procedures for timely re-establishment of vegetation that replicates the habitats disturbed (or, in the case of disturbed habitats dominated by non-native species, replaces them with suitable native species), as described in BR.1-2 (Habitat Restoration and Revegetation Plan).

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.15 BIOLOGICAL RESOURCES—WETLANDS

Please refer to EIR Section 4.5 for an analysis of impacts to biological resources, including wetlands.

Potential Effect and Rationale for Finding:

Clearing, grading, and construction activities have the potential to result in a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means.

There are no perennial or intermittent streams on the project site and wetlands that are present are associated with remnant natural and man-made drainages and six retention ponds designed to convey, hold and discharge runoff from the project site. Two of the basins ultimately discharge into Centinela Creek and the four other basins discharge to Ballona Creek. Portions of the drainages support riparian vegetation, a sensitive natural habitat, which is addressed in Impact BR.2. Wetland vegetation is also present within some of the retention ponds and in drainage channel on the western portion the site. Project activities have the potential to result in removal or damage to wetland vegetation. Although, the wetland vegetation is within retention ponds and man-made channels that are maintained which likely includes periodic removal of sediment and wetland vegetation, some wetland features on the project may fall under the jurisdiction of the USACE or the CDFG. If future oil development activities result in the removal of wetland or riparian vegetation or the deposition of fill into wetlands, delineation of these areas and

regulatory approval (which would potentially include CDFG Stream Bed Alteration Agreement; 1603 or, USACE permits; 404, 401, and/or 402) would be required.

If future oil development results in an alteration of the onsite hydrology or impacts to water quality that affect Centinela Creek or Ballona Creek offsite, it could result in a potentially significant impact to wetland resources, particularly Ballona Wetlands.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- Current construction and operation practices use BMPs to prevent potential pollutants and sediment from leaving the site (Impact WR.1). Operational discharges of storm water from the site as well as other activities that involve stormwater runoff are subject to the requirements of NPDES permits (see discussion under Impact WR.1). Construction activities, road maintenance, and cleaning of the retention basins are routinely scheduled for the dry season to minimize the potential for pollutant runoff to storm water. Implementation of WR.3 would help reduce potential impacts associated with alteration of hydrology.

- Mitigation ratios for loss of native plant communities are presented in BR.1-3, however, determination of mitigation ratio requirements for wetlands or riparian areas will be determined by the regulatory agencies (i.e., Los Angeles County, CDFG. USFWS, or USACE) during the permitting process. The mitigation ratio recommended in BR1-3 to compensate for the loss of riparian scrub habitat is 2:1; however, the regulatory agencies may require mitigation ratios greater than 2:1 to compensate for loss of wetland or riparian resources, depending on the condition of the resource, its location within a watershed, and its ability to provide value to wildlife (habitat value) as well other function (e.g., flood control, sediment removal, water quality).

- BR.3-1 Prior to construction in any riparian or potential wetland drainage feature, a wetland delineation report shall be prepared by a qualified, County-approved biologist. This report shall be submitted to the County and provided to the regulatory agencies during the application for water quality permits.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.16 BIOLOGICAL RESOURCES—BIRD MIGRATION AND NESTING

Please refer to EIR Section 4.5 for an analysis of impacts to biological resources, including bird migration and nesting.

Potential Effect and Rationale for Finding:

Continued construction and drilling activities have the potential to interfere with the movement of native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites.

Any substantial interference with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors, or impedance of the use of wildlife nursery sites would be considered a potentially significant impact. Future oil development activities that would disrupt wildlife movements and behavior include any clearing or degradation of vegetation that partially or completely isolates or segments portions of high quality and priority habitat. Plant communities at high risk of impacting wildlife include coastal scrub, coyote bush scrub and riparian habitats.

The contiguous areas of varied vegetation on the project site support habitat for a diversity of wildlife and plant species. Linked habitat corridors allow movement between communities, providing dispersal and escape routes for species threatened by extreme events, such as flooding and fire. Corridors of habitat also connect to the riparian, oak woodland, scrub, grassland, and wetland communities through and beyond the urban area to the northwest.

Given the current pattern of clearing and construction following the potential future development parameters, significant adverse impacts to wildlife corridors would be unlikely because the site has been in operation for over fifty years and the roads and pad sites distributed throughout the project site are already impacting migration movements. However, further expansion into high value habitat would decrease the quality and potential to sustain wildlife populations, especially in the western portion of the site where large areas of natural habitat form a connection to Ballona Creek and other natural areas north of the site. Encroachment into the habitat in this portion of the field through clearing, grading, and drilling operations has the potential to impact wildlife corridors, which would be considered a significant impact to wildlife resources.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- The restoration and avoidance measures proposed in BR-1 will help protect continuous areas of high quality habitat and the functions important to wildlife movement. The following shall be incorporated into the Special Status Species and Habitat Protection Plan (BR.1-1) and Habitat Restoration and Revegetation Plan (MM BR.1-2):

- BR.4-1 Restoration priority shall be given to areas of degraded habitat connecting areas of higher quality habitat and where restoration would produce larger corridors to support the migration and movement of wildlife. The Baldwin Hills Park Master Plan (CDPR and BHC 2002) established priority areas for restoration efforts illustrated in Figure 4.5-3. These areas include the northwestern portion of the project area, the southern portion south of Stocker Road and far eastern section adjacent to Kenneth Hahn State Recreation Area, as shown in light green on Figure 4.5-3. Areas shall be designated for restoration priority to preserve and enhance wildlife corridors on the site in the

Special Status Species and Habitat Protection Plan (BR.2-1b) and restored or enhanced in accordance with the requirements of the Native Habitat Restoration Plan (BR.1-1).

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.17 BIOLOGICAL RESOURCES—OAK TREES

Please refer to EIR Section 4.5 for an analysis of impacts to biological resources, including oak trees.

Potential Effect and Rationale for Finding:

Construction activities have the potential to conflict with local policies or ordinances protecting biological resources, specifically the Los Angeles County Oak Tree Ordinance.

Oak trees are present on the project site and have the potential to be removed or damaged as a result of future oil development activities. Most of the oak trees are in a small area (1.5 acres) of oak woodland in the northwest portion of the site and surrounded by slopes that are densely vegetated with good quality coastal scrub. Loss of individual oak trees in this area would also result in loss of sensitive natural communities, which is addressed in Impact BR.2. However, in addition to the loss of the community, damage to or loss of an individual oak tree would be considered a significant impact on this resource and would require a permit and replacement in accordance with the Los Angeles County Oak Tree Ordinance (LAFD 2007) and California Public Resources Code 21083.4).

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- Implementation of BR-1-1, the Special Status Species and Habitat Protection Plan which includes avoidance and minimization of impacts to oak woodland, and BR.1-2, the Native Habitat Restoration Plan, would reduce impacts to oak woodland habitat as well as individual oak trees.

- BR.5-1 The Los Angeles County Oak Tree Ordinance requires preparation of an oak tree report and replacement with 15-gallon oaks at a ratio of 2:1, with replacement trees maintained for 2 years, if oak trees are to be impacted. Payment into an oak forests special fund (such as the fund established under the Oak Woodlands Conservation Act of 2001) may be considered if replacement is infeasible (LAFD 2007).

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.18 WATER RESOURCES—GROUNDWATER QUALITY

Please refer to EIR Section 4.6 for an analysis of impacts to water resources, including groundwater quality.

Potential Effect and Rationale for Finding:

A rupture or leak from oil wells, pipelines, or other oil field related infrastructure, including wastewater injection wells, could substantially degrade surface and groundwater quality.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- Implementation of Risk mitigation measures R.2-1 and R.2-2 and adherence to the Spill Prevention and Control and Countermeasure Plan (mitigation measure WR.1-2) described above would contribute in limiting the potential for spills and associated significant impacts.

- WR.2-1 The oil field operator shall install one groundwater monitoring well in the vicinity of each surface water retention basin that is permitted by the RWQCB, and implement a revised groundwater quality monitoring program, consistent with the requirements of the Los Angeles Regional Water Quality Control Board and Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division. The wells shall be completed to the base of the permeable, potentially water-bearing, alluvium, Lakewood Formation, and San Pedro Formation, and to the top of the underlying, non-water bearing Pico Formation, as determined by a California-registered Professional Geologist. In the event that a release of wastewater or petroleum is detected in these monitoring wells, remediation shall be completed to the satisfaction of the Los Angeles Regional Water Quality Control Board and Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division.

- WR.2-2 The oil field operator shall annually implement mechanical integrity tests of injection well, idle oil well, and active oil well casing and annular seals, as specified in California Code of Regulations Title 14, Division 2, Sections 1723.9 and 1724.10, and as approved by the California Division of Oil, Gas, and Geothermal Resources. In the event that integrity tests indicate that well casing or annular seals have degraded, repairs and other remedial actions shall be made that meet California Division of Oil, Gas, and Geothermal Resources requirements.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.19 WATER RESOURCES—FLOODING

Please refer to EIR Section 4.6 for an analysis of impacts to water resources, including flooding.

Potential Effect and Rationale for Finding:

New grading and construction would alter the existing drainage pattern of the site and potentially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.

Natural drainage patterns directing sheet flow toward drainages and six on-site retention basins would be modified by this grading, requiring the need for engineered surface and subsurface storm drains. Future oil field development would reduce pervious surfaces (the ground surface area capable of absorbing rainfall) and therefore increase storm water runoff across the site and into the retention basins. The conversion of existing sandy soils and vegetation to impervious surfaces would alter the existing drainage pattern within the active surface field boundary from general sheet flow to concentrated flows directed from individual well pads and related infrastructure building pads. This increased and concentrated flow would increase the rate and amount of storm surface runoff that would flow into the retention basins, thus potentially resulting in basin over-topping.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- WR.3-1 Prior to new grading and construction, a site-specific hydrologic analysis shall be completed to evaluate anticipated changes in drainage patterns and associated increased runoff at the site associated with grading and loss of vegetated, sandy, permeable ground areas. The analysis shall be completed consistent with Standard Urban Stormwater Mitigation Plan regulations, as specified in the Los Angeles County Department of Public Works Hydrology Manual (Los Angeles County Department of Public Works 2006). The analysis shall include, but not be limited to a comparison of expected runoff and design capacities of existing and proposed (if necessary) retention basins, which shall be designed such that there is no net increase in surface water runoff from the Project site. The hydrologic analysis shall be completed by a California Registered Civil Engineer and approved by the Los Angeles County Department of Public Works, Water Resources Division.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.20 WATER RESOURCES—LOCAL GROUNDWATER SUPPLIES

Please refer to EIR Section 4.6 for an analysis of impacts to water resources, including local groundwater supplies.

Potential Effects And Rationale Supporting Finding:

Future oil field development operations would not substantially deplete groundwater supplies such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Groundwater beneath the site consists of limited, perched, non-potable aquifers, which are not used for oil field domestic supplies or operations. California American Water, the local water purveyor for the Inglewood Oil Field, provides water for these purposes. There would be no impact on groundwater supplies such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Required Mitigation Measures

The following required mitigation measures will reduce impacts to less than significant levels:

- WR.4-1 The Operator shall develop and deliver to the Los Angeles County Director of Planning and Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, for review and approval, a Water Management Plan, which shall include Best Management Practices and water conservation measures, including, but not limited to the use of a drip irrigation system and the use of reclaimed water and surface runoff retention basin water for reinjection, dust suppression, and landscaping uses, as available. The Operator shall make changes to the Water Management Plan if requested by the Los Angeles County Director of Planning and Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division.

- In addition, please see Mitigation Measure V.1-1 which requires conservation measures be used as part of the landscaping requirements.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.21 LAND USE—NOISE INCOMPATIBILITY

Please refer to EIR Section 4.8 for an analysis of land use impacts, including noise incompatibility.

Potential Effect and Rationale for Finding:

Noise generated from drilling, construction, and potential future operations could be incompatible with the adjacent land uses.

As discussed in EIR section 4.9 Noise and Vibration, long-term noise monitoring was performed at a total of seven sites around the perimeter of the oil field, selected to represent the closest residential uses as well as the Kenneth Hahn State Recreation Area and the West Los Angeles College. All seven sites selected found oil field noise sources to be audible during the monitoring period. The addition of oil field production activities including well drilling, site preparation, well workovers, and well pump operation may create potentially significant noise impacts to off-site locations. Implementation of mitigation measures, as provided in Section 4.9, would be required to minimize impacts to less than significant levels. Mitigation measures include but are not limited to establishment of setback buffer zones, noise barriers, limiting hours of operation where applicable, and equipment selection and maintenance.

Required Mitigation Measures:

Noise mitigation measures N.1-1 to N.1-5, N.3-1, N.4-1, N.5-1 and N.5-2 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.22 LAND USE—VISUAL INCOMPATIBILITY

Please refer to EIR Section 4.8 for an analysis of land use impacts, including visual incompatibility.

Potential Effect and Rationale for Finding:

Views of drilling rigs, construction, and potential future operations could be incompatible with the adjacent land uses.

Visual impacts associated with the proposed on-going activities within a thoroughly developed oil field are not considered as likely to result in a significant impact to existing views through the degradation of unique on-site visual resources in the Inglewood Oil Field. However, potentially significant visual impacts could result in locations where continued oil field operations may add significantly to the visual clutter of oil field facilities through the addition and/or expansion of facilities within specific viewsheds. The addition of oil field production equipment and/or additional grading or other site preparations associated with such activities may create potentially significant visual impacts unless effective mitigation measures are undertaken that would screen the visibility of equipment or conceal it from view through the addition of landscaping buffers and/or raised landscaped earthen berms. Mitigation includes the installation of dense landscaping screens designed to lessen the prominent or stark appearance of added oil production equipment. The planting of vegetative shrub screens along berms or as strategically clustered landscape trees in specified locations situated between sensitive viewing locations and intensified production locations, would be required to minimize the visual impact of expanded production facilities to less than significant levels. Mitigation also includes the removal of equipment no longer is use and the repainting of facilities that are considered to be in a dilapidated condition.

Required Mitigation Measures:

Visual Resources and Aesthetics mitigation measures V.1-1 to V.1-5 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.23 LAND USE—NIGHTTIME LIGHTING

Please refer to EIR Section 4.8 for an analysis of land use impacts, including nighttime lighting.

Potential Effect and Rationale for Finding:

Future oil field development could increase nighttime lighting and glare inconsistent with the surrounding land uses. Visual impacts associated with the alteration of night-lighting in areas of existing petroleum production activities where expansions and/or the extension of activities would be undertaken are considered to be potentially significant but capable of being mitigated to less than significant levels through the application of existing county regulations requiring the shielding of exterior night lighting and the containment of spill-over lighting from fixed point lighting sources. Mitigation in the Visual Resources and Aesthetics Section also requires the preparation of a detailed Lighting Plan, which would further reduce lighting impacts.

Where new oil wells are to be drilled, and operations are scheduled on a round-the-clock basis, lighting of the work site drilling areas to assure project safety conditions may also create prominent sources of night lighting for the duration of drilling. In such cases, application of drill site setbacks (as required under the Public Health Risk Section) from adjacent sensitive land uses combined with the requirement to shield the fixed lighting sources on the drill rig would reduce levels of the temporary night-lighting associated with drill rigs.

Required Mitigation Measures:

Visual Resources and Aesthetics mitigation measures V.5-1 to V.5-2 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.24 LAND USE—EMISSIONS AND ODORS

Please refer to EIR Section 4.8 for an analysis of land use impacts, including emissions and odors.

Potential Effect and Rationale for Finding:

As noted in Section 4.3, Public Health, the Inglewood Oil Field exceeds thresholds based on the Health Risk Assessment modeling results, and potential health risks would be considered

potentially significant. Sources that contributed the greatest to the high health risk levels included diesel engines, especially those associated with the drilling of wells. Health Risk Assessment modeling results also indicate that the acute hazard index of 1.0 would be exceeded at distances within 400 feet of well drilling activities unless the drill rig generator can be at least 500 feet from the drill rig and 300 feet from areas of public exposure. In that case, an offset of 300 feet is acceptable. The Maximum hazard index associated with well drilling was as high as 1.3 in the immediate vicinity of the drill rig, dropping to below 1.0 at approximately 400 feet from the drill rig.

As noted in Section 4.3, Air Quality, odor events could increase due to added equipment, increased operations at existing equipment and increased drilling. Added equipment would increase the number of components that could leak causing odors. Increased operations would increase the use of tanks, potentially leading to odor events. Increased drilling would increase the frequency of emissions from drilling muds during drilling operations. Some of these types of releases have reached recreational areas surrounding the site and caused notice of violations historically. These would be considered a significant, but mitigable impact.

Required Mitigation Measures:

Public Health and Air Quality mitigation measures PH.1-1, PH.2-1, AQ.3-1, AQ.3-2, AQ.3-3, AQ.3-4 and AQ.3-5 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.25 NOISE AND VIBRATION—WELL DRILLING

Please refer to EIR Section 4.9 for an analysis of noise and vibration impacts, including from oil drilling.

Potential Effect and Rationale for Finding:

New well drilling activity could significantly elevate noise levels at the perimeter of the oilfield. Noise and ground vibration levels were studied during the drilling of a new injector well – Vapor Recovery Unit 294, located in the Vickers No. 1 region of the oilfield – on May 24 and 25, 2007, which were the first days of drilling when the drill bit was at a depth of less than 1,000 feet.

The results of the analysis indicate that drilling noise would be considered significant depending upon the location of the drill rig within the oil field. The data collected from VRU 294 has been extrapolated to determine approximate noise levels for a drilling rig with little or no noise mitigation at various distances. The results of this analysis are shown in Table 4.9.8 of the EIR.

The results of the analysis indicate that unmitigated drilling noise would be considered significant depending upon the location of the drill rig within the oil field and the background noise level at the nearest sensitive receptor.

For example, at the homes on Culver Crest near Marycrest Manor, the nighttime baseline noise level is 45 dBA, Leq. To keep below the significance threshold, the noise level from any drilling in the vicinity would need to be limited to 48 dBA, so that the combined noise level (baseline plus drilling) was no more than 50 dBA. An unmitigated drilling rig located 1000 feet from the property line would produce an approximate noise level of 56 dBA, so mitigation would be required to achieve at least an 8 dBA reduction in noise level in this case. Similarly, an unmitigated drilling rig located 400 feet from the property line would produce an approximate noise level of 66 dBA, so that mitigation measures would need to provide at least 18 dBA noise level reduction.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- N.1-1 Hourly, A-weighted equivalent noise levels at the property line of a neighboring use shall not elevate existing baseline levels by more than 5 dBA. This limit on noise will require the use of noise barriers and/or enclosures. The drilling process includes a variety of sources distributed horizontally and vertically, which shall require a system of noise barriers each addressing a specific source, including: the mast board and rig floor, mud works, drill rig motors, coil tubing unit, cutting conveyor and openings to the generator enclosure. Noise barrier blankets are available in 1" to 2" thickness, with densities ranging from 1 lb/ft2 to 2.5 lb/ft2. Noise levels measured at various drilling sites indicate a reduction of 15 dBA from 1" thick noise barriers (Arup 2004, Soundseal). Thicker, denser material can achieve a greater sound reduction. The difference between a sound barrier and a sound enclosure is that a sound barrier is a wall erected out of the sound barrier blanket material, whereas a sound enclosure encloses the entire piece of equipment effectively forming a room in which the equipment is placed. Enclosures that are offered by a variety of companies can reduce noise levels up to 23 dBA. If the enclosures are insulated with additional foam, noise reduction could be 6-8 dBA higher (or up to 31-33 dBA). The exact types of sound barrier or enclosure required for each drilling operation will depend on the amount of noise reduction required. In addition to noise barriers and enclosures there are a number of other possible techniques that could be used by the oilfield operator to reduce noise from the drilling rig. Several companies produce "critical" grade exhaust muffler systems used to reduce noise from heavy duty diesel engines; these systems could be used to reduce the noise from the crane and diesel generator. They have a range of noise reduction levels and they can attenuate noise by 23-35 dBA. Further noise-reduction techniques include: use of resilient pads on the drill floor, pipe storage area and V-door to reduce metal-to-metal noise; sound covers on the drawworks to reduce brake noise and use of visual signals and radios instead of back-up alarms, annunciators and shouted instructions. The noise output of new drilling rigs could be substantially reduced by use of a remote power generator, situated at the center of the oilfield and away from the sensitive uses at the perimeter, with electrical cables run out to the drill sites. Alternatively, drilling rigs could be powered from the grid (with an emergency-only back-up generator). Another possible solution to noise from drilling is that the oilfield operator should allow sufficient distance between new well drilling sites and the oilfield perimeter. This distance would be determined based upon the noise level of the drilling and the location in the oil field. The oil field operator could implement a

quiet mode of operation during night-time hours when background noise levels are at their lowest. This could include items such as:

- Derrick man to take particular care when standing back stands while tripping out of hole to ensure that there is minimal clanging of pipe in the derrick.
- While Tripping in the hole, ensure that the blocks are completely stopped prior to latching the elevators.
- Whenever latching the elevators, lay the pipe in the elevators, latch slowly and as quietly as possible.
- When picking up drill pipe or casing use the high line, and try to prevent hitting the pipe against the cat walk and v-door.
- Make sure that there is rubber on the v-door when picking up pipe.
- Place rubber or wood on the catwalk when rolling pipe off the pipe racks onto the catwalk. Minimize any banging of pipe on the catwalk by careful use of the forklift.

- N.1-2 Noise produced by drilling operations shall include no pure tones when measured at a neighboring property. A pure tone shall be deemed to exist if the one-third octave band sound-pressure level in the band with the tone exceeds the arithmetic average of the sound-pressure levels of the two contiguous one-third octave bands by 5 dB for center frequencies of 500 Hertz and above, and by 8 dB for center frequencies between 160 and 400 Hertz, and by 15 dB for center frequencies less than or equal to 125 Hertz.

- N.1-3 Deliveries to the oilfield shall be limited to between the hours of 7:00 A.M to 8:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 8:00 P.M.

- N.1-4 Deliveries to a well drilling site within 500 feet of a sensitive receptor shall be limited to between the hours of 7:00 A.M to 5:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 5:00 P.M.

- N.1-5 Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 P.M. and 8:00 AM. During periods when the backup alarms are disabled, the oil field operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

- N.1-6 All drilling equipment shall be regularly serviced, maintained and repaired to minimize increases in noise output with time and to ensure that tonal noise from worn bearings, metal-on-metal contact, valves etc does not cause significant tonal noise at the oilfield perimeter.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.26 NOISE AND VIBRATION—WELL WORKOVER

Please refer to EIR Section 4.9 for an analysis of noise and vibration impacts, including from well workover.

Potential Effect and Rationale for Finding:

Workover of oil wells could significantly elevate noise levels at the perimeter of the oilfield.

Well workover activities will generally require less noise mitigation than new well drilling because the nature of the work allows it to be limited to the daytime hours, when baseline noise levels around the perimeter are higher. Also, the typical workover drilling rig is much smaller than the rigs used for new well drilling. It follows that workover of existing oil wells will generally be allowed to occur closer to the oilfield perimeter than drilling of new wells. However, since the location of future well sites will be controlled by the need to meet the more stringent noise mitigation requirements for new well drilling, workover of future well bores will automatically observe the longer buffer zone distances required for new well drilling. Depending upon the location of the workover operations, the impact could be significant, particularly in close proximity to the boundary of the oil field.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- N.2-1 Hourly, A-weighted equivalent noise levels at the property line of a neighboring use shall not elevate existing baseline levels by more than 5 dBA. This limit on noise will require the use of noise barriers and/or acoustical enclosures. The well workover and redrilling processes includes a variety of sources distributed horizontally and vertically, which shall require a system of noise barriers each addressing a specific source, including: the mast board and rig floor, mud works, drill rig motors, coil tubing unit, cutting conveyor and openings to the generator enclosure. The exact types of sound barrier or enclosure required for each well workover operation will depend on the amount of noise reduction required. In addition to noise barriers and enclosures there are a number of other possible techniques that could be used by the oilfield operator to reduce noise from the well workover rig including "critical" grade exhaust muffler systems used to reduce noise from diesel engines; these systems could be used to reduce the noise from the crane and diesel generator. They have a range of noise reduction levels and they can attenuate noise by 23-35 dBA. Further noise-reduction techniques include use of resilient pads on the drill floor, pipe storage area and V-door to reduce metal-to-metal noise; sound covers on the drawworks to reduce brake noise and use of visual signals and radios instead of back-up alarms, annunciators and shouted instructions. The noise output of well workover rigs could be substantially reduced by use of a remote power generator, situated at the center of the oilfield and away from the sensitive uses at the perimeter,

with electrical cables run out to the workover sites. Alternatively, well workover rigs could be powered from the grid (with an emergency-only back-up generator).

- N.2-2 Noise produced by well workover operations shall include no pure tones when measured at a neighboring property. A pure tone shall be deemed to exist if the one-third octave band sound-pressure level in the band with the tone exceeds the arithmetic average of the sound-pressure levels of the two contiguous one-third octave bands by 5 dB for center frequencies of 500 Hertz and above, and by 8 dB for center frequencies between 160 and 400 Hertz, and by 15 dB for center frequencies less than or equal to 125 Hertz.

- N.2-3 Deliveries to the oilfield shall be limited to between the hours of 7:00 A.M to 8:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 8:00 P.M.

- N.2-4 Deliveries to a well workover site within 500 feet of a sensitive receptor shall be limited to between the hours of 7:00 A.M to 5:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 5:00 P.M.

- N.2-5 Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 P.M. and 8:00 AM. During periods when the backup alarms are disabled, the oil field operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

- N.2-6 All well workover equipment shall be regularly serviced, maintained and repaired to minimize increases in noise output with time and to ensure that tonal noise from worn bearings, metal-on-metal contact, valves etc does not cause significant tonal noise at the oilfield perimeter.

- N.2-7 Well workover operations, including repairs, servicing and maintenance work shall be limited to the hours of 7:00 AM to 7:00 PM.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.27 NOISE AND VIBRATION—WELL PUMP OPERATIONS

Please refer to EIR Section 4.9 for an analysis of noise and vibration impacts, including from well pump operations.

Potential Effect and Rationale for Finding:

Well pump operation could cause noise levels at the perimeter of the oilfield to exceed the Noise Standards in section 12.08.390 of the Los Angeles County Code.

Noise levels produced by existing well pumps on the oilfield were measured on July 16, 2007. The wells included in this study were selected to represent the range of pump sizes and designs

in use on the oilfield. Noise levels were measured at a distance of 10-feet from each pump, to minimize noise contributions from other noise sources in the vicinity, and on all three sides of the pump to ensure that noise contributions from all components were captured in the readings.

Measurements of noise produced by existing well pumps on the oilfield indicate that these machines are relatively quiet, largely because they are driven by electric motors rather than internal combustion engines. Typical noise levels from the measured sampling were less than 70 dBA at a distance of 10-feet. However, where pumps are clustered together, their individual noise outputs will combine, resulting in an increased potential for noise impact. Noticeable "screech" and "whine" noise was produced by two of the older machines which was probably the result of inadequate lubrication and/or worn parts.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- N.3-1 Noise produced by well pumps shall not exceed any of the five Noise Standards in section 12.08.390 of the Los Angeles County Code. Satisfying this limit on noise may require the use of noise barriers and/or acoustical enclosures.

- N.3-2 Consistent with the requirements of section 12.08.410 of the County Code, the noise limit shall be made more stringent by 5 dBA for any sources that produce pure tone or impulsive noise. A pure tone shall be deemed to exist if the one-third octave band sound-pressure level in the band with the tone exceeds the arithmetic average of the sound-pressure levels of the two contiguous one-third octave bands by 5 dB for center frequencies of 500 Hertz and above, and by 8 dB for center frequencies between 160 and 400 Hertz, and by 15 dB for center frequencies less than or equal to 125 Hertz.

- N.3-3 Existing and future well pumps shall be regularly serviced and repaired to ensure that tonal noise from worn bearings; metal-on-metal contact etc does not cause significant tonal noise at the oilfield perimeter.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.28 NOISE AND VIBRATION—GAS PLANT

Please refer to EIR Section 4.9 for an analysis of noise and vibration impacts, including from the gas plant.

Potential Effect and Rationale for Finding:

Future operation of the gas plant, including new or replacement equipment, expanded operation or increased noise output from existing equipment can cause noise levels at the perimeter of the oilfield to exceed the Noise Standards in section 12.08.390 of the Los Angeles County Code.

Noise levels produced by the current operation of the gas plant were measured on July 16, 2007. Noise measurements were made at a number of points around the perimeter of the plant, at a distance of 250-feet from the approximate center of the facility. The measurement microphone was elevated approximately 10-feet above ground level.

Noise levels produced by the gas plant at the closest sensitive uses have been estimated by applying distance losses, derived from standard (geometric) propagation equations and estimates of ground effects and terrain effects, to the measured noise data. This analysis indicates that the existing levels of noise from the gas plant would be considered less than significant.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- N.4-1 Noise produced by the Gas Plant shall not exceed any of the five Noise Standards in section 12.08.390 of the Los Angeles County Code. Satisfying this limit on noise may require the use of noise barriers and/or acoustical enclosures. Steps that the oil field operator could take to meet these standards could include selection of low noise output equipment when installing new or replacing existing equipment. Noise barriers should be used to reduce the noise output of equipment added to the Gas Plant. In addition to purpose-built noise barriers, careful location of new equipment could also help reduce noise impact by utilizing existing Gas Plant structures to shield the oilfield perimeter from additional noise sources.

- N.4-2 Consistent with the requirements of section 12.08.410 of the County Code, the noise limit shall be made more stringent by 5 dBA for any sources that produce pure tone or impulsive noise. A pure tone shall be deemed to exist if the one-third octave band sound-pressure level in the band with the tone exceeds the arithmetic average of the sound-pressure levels of the two contiguous one-third octave bands by 5 dB for center frequencies of 500 Hertz and above, and by 8 dB for center frequencies between 160 and 400 Hertz, and by 15 dB for center frequencies less than or equal to 125 Hertz.

- N.4-3 Deliveries to the oilfield shall be limited to between the hours of 7:00 A.M to 8:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 8:00 P.M.

- N.4-4 Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 P.M. and 8:00 AM. During periods when the backup alarms are disabled, the oil field operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

- N.4-5 Existing and future Gas Plant equipment shall be regularly serviced and repaired to minimize increases in noise output with time and to ensure that tonal noise from worn bearings, metal-on-metal contact, valves etc does not cause significant tonal noise at the oilfield perimeter.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.29 NOISE AND VIBRATION—OTHER EQUIPMENT

Please refer to EIR Section 4.9 for an analysis of noise and vibration impacts, including from other equipment not discussed above.

Potential Effect and Rationale for Finding:

Operation of all existing and future equipment and facilities not included above (including, but not limited to: the gas flare; central water plant; pumps; valves; tanks; biofarms; workshops; yards; potential future facilities, such as the steam, water treatment, and oil cleaning plants) could cause noise levels at the perimeter of the oilfield to exceed the Noise Standards in section 12.08.390 of the Los Angeles County Code.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- N.5-1 Noise produced by operations, facilities and equipment shall not exceed any of the five Noise Standards in section 12.08.390 of the Los Angeles County Code. Satisfying this limit on noise may require the use of noise barriers and/or acoustical enclosures. Steps that the oil field operator could take to meet these standards could include selection of low noise output equipment when installing new or replacing existing equipment. Noise barriers should be used to reduce the noise output of equipment and facilities. In addition to purpose-built noise barriers, careful location of new equipment could also help reduce noise impact by utilizing existing structures and topographical features to shield the oilfield perimeter from noise sources and by providing a sufficient buffer-zone distance.

- N.5-2 Consistent with the requirements of section 12.08.410 of the County Code, the noise limit shall be made more stringent by 5 dBA for any sources that produce pure tone or impulsive noise. A pure tone shall be deemed to exist if the one-third octave band sound-pressure level in the band with the tone exceeds the arithmetic average of the sound-pressure levels of the two contiguous one-third octave bands by 5 dB for center frequencies of 500 Hertz and above, and by 8 dB for center frequencies between 160 and 400 Hertz, and by 15 dB for center frequencies less than or equal to 125 Hertz.

- N.5-3 Deliveries to the oilfield shall be limited to between the hours of 7:00 A.M to 8:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 8:00 P.M.

- N.5-4 Deliveries to any site within 500 feet of a sensitive receptor shall be limited to between the hours of 7:00 A.M to 5:00 P.M. Deliveries on Sunday and legal holidays shall be limited to between the hours of 9:00 A.M to 5:00 P.M.

- N.5-5 Backup alarms on all vehicles operating within the oil field shall be disabled between the hours of 8:00 P.M. and 8:00 AM. During periods when the backup alarms are disabled, the oil field operator shall employ alternate, low-noise methods for ensuring worker safety during vehicle backup, such as the use of spotters.

- N.5-6 Equipment shall be regularly serviced and repaired to ensure that tonal noise from worn bearings; metal-on-metal contact etc does not cause significant tonal noise at the oilfield perimeter.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.30 NOISE AND VIBRATION—NEW PLANTS OR FACILITIES

Please refer to EIR Section 4.9 for an analysis of noise and vibration impacts, including from new plants or facilities.

Potential Effect and Rationale for Finding:

Construction of new plant or facilities, such as the potential new steam, water treatment and oil cleaning plants as well as grading of new well pads and potential new gas flare could generate noise levels at the oil field perimeter that exceed the limits in section 12.08.440 of the Los Angeles County Code.

Noise associated with construction of the potential future steam, water treatment and oil cleaning plants on the oilfield has been analyzed based on projected construction schedules and noise level estimates for the anticipated construction equipment. In each case, construction noise estimates have been calculated for the closest section of the oilfield perimeter. In addition, noise levels at the perimeter of the oilfield have been estimated for the grading of new well pads at various distances.

Consistent with the County Code construction noise limits, the analysis focuses on maximum noise levels (as opposed to hourly or daily averages) and assumes a worst-case scenario of all equipment operating simultaneously.

Steam Plant

The potential future steam plant would be located west of Fairfax Avenue, south of Stocker Street. The closest sensitive uses would be the homes at the eastern edge of Ladera Heights, which overlook the steam plant site and are approximately 1200 feet away.

Estimated noise levels at these homes during the various phases of steam plant construction are in the 58 – 60 dBA range, which complies with the 60 dBA daytime limit prescribed by the County Code for long-term (10 days or more) construction noise at single family homes.

However, estimated steam plant construction noise levels at the homes on Ladera Heights would greatly exceed the 50 dBA nighttime limit (which also applies to Sundays and legal holidays) prescribed by the County Code for long-term construction noise at single-family homes.

Water Treatment Plant

The potential future water treatment plant would be located just to the east of La Cienega Boulevard, north of Stocker Street. The closest sensitive uses would be the homes at the northeastern corner of Ladera Heights, which overlook the water treatment plant site and are approximately 1500 feet away.

Estimated noise levels at these homes during the various phases of the water treatment plant construction are in the 55 – 57 dBA range, which complies with the 60 dBA daytime limit prescribed by the County Code for long-term (10 days or more) construction noise at single family homes.

However, estimated steam plant construction noise levels at the homes on Ladera Heights would greatly exceed the 50 dBA nighttime limit (which also applies to Sundays and legal holidays) prescribed by the County Code for long-term construction noise at single-family homes.

Oil Cleaning Plant

The potential future oil cleaning plant would be located close to the existing central oil sales facility and Packard tanks and approximately 500 feet from the community center at the southern edge of Kenneth Hahn State Recreational Area; this site is in a low-lying area, distant from any residential uses and screened from those uses by the intervening topography of the oilfield.

The estimated maximum noise level at the community center during the various phases of the oil plant construction are in the 68 – 70 dBA range, which complies with the 70 dBA daytime limit prescribed by the County Code for long-term (10 days or more) construction noise at commercial structures.

However, the estimated construction noise level range greatly exceeds the 60 dBA nighttime limit (which also applies to Sundays and legal holidays) at commercial structures prescribed by the County Code for long-term construction.

New Well Pad Grading

For new well pad grading projects lasting less than 10 days, noise limits of 75 dBA during the daytime and 60 dBA at night would apply at the nearest single family homes, per the Los Angeles County Code. Grading noise level estimates for well pad distances of 400 feet or more from the oilfield perimeter are below 75 dBA and therefore in compliance with the daytime requirements of the Code. However, estimated perimeter noise levels for pad grading work at distances of less than 1200 feet exceed the 60 dBA nighttime noise limit.

For new well pad grading projects lasting for 10 days or more, noise limits of 60 dBA during the daytime and 50 dBA at night would apply at the nearest single family homes, per the Los

Angeles County Code. Grading noise level estimates for well pad distances of less than 1200 feet exceed the 60 dBA daytime noise limit and greatly exceed the 50 dBA nighttime noise limit.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

N.6-1 Noise from construction projects, including the potential future steam, water treatment and oil cleaning plants as well as new well pad grading and the potential new gas flare, shall not exceed the allowable limits prescribed in section 12.08.440 of the Los Angeles County Code.

N.6-2 Construction activity on the oilfield shall be limited to the hours of 7:00 AM to 7:00 PM, Mondays through Fridays. There shall be no construction on Saturdays, Sundays or legal holidays.

N.6-3 Utilize temporary noise barriers to block the line-of-sight between construction activity and the nearest sensitive uses at the perimeter of the oilfield, as necessary to maintain noise levels below the limits required by the Los Angeles County Code.

N.6-4 Construction equipment shall be selected for low-noise output. All construction equipment powered by internal combustion engines shall be properly muffled and maintained.

N.6-5 Unnecessary idling of internal combustion engines near noise-sensitive areas shall be prohibited.

N.6-6 Locate all stationary noise-generating construction equipment as far as possible from sensitive land uses at the perimeter of the oilfield.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.31 VIBRATION

Please refer to EIR Section 4.9 for an analysis of vibration impacts.

Potential Effect and Rationale for Finding:

Future operation drilling and operations at the oil field could generate increased vibration levels at the oil field perimeter.

Ground vibration levels were measured during typical drilling activities at the Vapor Recovery Unit-294 pad. Measurements were made at various distances from the drill rig with the accelerometer (vibration transducer) buried at a depth of approximately 2-feet.

Measured vibration levels due to drilling activity at Vapor Recovery Unit-294 are all substantially below the 0.25 mm/s (rms) significance criterion over the frequency range, even in

very close proximity (50-feet) to the drill rig. Therefore the vibration impacts of drilling would be considered less than significant.

A major source of vibration and low-frequency airborne noise at the oil field is the gas plant flare. Under normal operating conditions, gas from the gas plant is shipped via pipeline into a gas pipeline to the BP Refinery or a Southern California Gas transmission pipeline. There are times when these transmission pipelines are shut-down without prior knowledge of the oil field operator. When this happens, the gas from the gas is routed to the flare. This places a large volume of gas through the flare which produces vibration and low-frequency airborne noise that affects offsite areas, particularly in the Ladera Heights area. There is documented evidence that the vibration and low frequency airborne noise has caused rattling of windows and other items in homes that border the oil field.

Given that these events are unplanned, it was not possible to measure the level of vibration produced by the gas flare or to evaluate the level of low-frequency airborne noise during the baseline study. A review of the flaring records for 2007 through April of 2008 showed large volumes of gas going to the flare on 21days. It is likely that vibration and low frequency airborne noise that affected offsite locations occurred on each of these days. The vibration and low-frequency airborne noise associated with flaring large volumes of gas would be considered significant.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- N.7-1 Vibration levels from drilling and operations shall not exceed a velocity of 0.25 mm/s (rms) over the frequency range 1 to 100 Hz at the property line.

- N.7-2 The oil field operator shall install a new flare that is capable of handling the full volume of gas from the gas plant without elevating vibration levels or low-frequency ambient noise levels at the oil field perimeter. The oil field operator shall implement operating procedures that limit the amount of gas going to the flare to below that which causes vibration or low level airborne noise at offsite locations. These operating procedures shall be implemented until such time as the new flare is installed.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.32 RECREATION—NOISE

Please refer to EIR Section 4.10 for an analysis of impacts to recreational facilities, including noise impacts.

Potential Effect and Rationale for Finding:

Noise generated from drilling, construction, and operations could affect recreational activities.

Construction, drilling and new operations would generate additional noise in the vicinity of the Inglewood Oil Field. Noise impacts are evaluated in Section 4.9 of the EIR. Construction noise would be less than significant as it is short term and would only affect daytime hours. For the recreational users, however, elevated noises from construction machinery could be annoying and could disrupt their normal recreational activities, particularly if the construction activities are located close to the border between the oil field and the Kenneth Hann State Recreational Area, Culver City Park, Baldwin Hills Sports Complex, etc. However, none of the recreational areas in the vicinity of the project site would typically be affected by higher than 70 dBA daytime noise levels for construction, which are specified as acceptable noise levels in recreational areas such as parks by the County of Los Angeles guidelines. This impact therefore would be less than significant.

Noise from drilling could be significant without mitigation and could produce nuisance to the recreational users in close proximity to the oil field, depending upon the location of the drilling activities. However, noise from drilling is considered to be temporary in nature and would only occur during the time that a well is being drilled. In addition, noise levels can be mitigated to less than significant levels, and therefore, recreational impacts from noise would also be less than significant with mitigation, if Mitigation Measures N.1-1 to N.1-5, N.3-1, N.4-1, N.5-1and N.5-2 are implemented.

Noise from major operations would be associated with new oil pumps, which have a noise level that is below the current background noise. Therefore, operation of new oil pumps would be less than significant.

Required Mitigation Measures:

Noise mitigation measures N.1-1 to N.1-5, N.3-1, N.4-1, N.5-1 and N.5-2 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.33 RECREATION—VIEWS

Please refer to EIR Section 4.10 for an analysis of impacts to recreational facilities, including view impacts.

Potential Effect and Rationale for Finding:

The new drilling and operations would adversely affect public viewsheds. The active oil field production and processing facilities are in close proximity to a number of nearby public parks, a state recreation area, and a scenic overlook that contain hiking and walking trails and associated picnic and sports field activity areas. A detailed evaluation of the visual impacts is provided in EIR Section 4-13, Visual Resources and Aesthetics. Many of the recreational locations offer public visibility of the Inglewood Oil Field ranging from views of immediately adjacent oil field production facilities to views of such facilities situated at considerably greater distances along viewshed defining ridgelines where they commonly protrude into the skyline. The existing view

provided to recreational users would not be significantly altered as a result of the potential future oil field development. However, because of the proximity of recreational facilities to existing oil field operations within the Baldwin Hills, adverse recreational impacts could result from additional site grading of the remaining natural terrain, the removal of natural vegetation, and/or from the introduction of concentrations of additional oil field industrial development that would be perceived as incompatible with adjacent uses, structures, or the existing intensity of development. Recreational impacts are considered adverse, but not significant once the mitigation measures discussed in Section 4-13 are implemented.

Required Mitigation Measures:

Visual and Aesthetics mitigation measures V.1-1 to V.1-5, and V.5-1 to V.5-2 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.34 RECREATION—ODORS

Please refer to EIR Section 4.10 for an analysis of impacts to recreational facilities, including impacts from odor events.

Potential Effect and Rationale for Finding:

As noted in EIR Section 4.3, Air Quality, odor events could increase due to the addition of new equipment, increased operations at existing equipment and increased drilling. Added equipment would increase the number of components that could leak causing odors. Increased operations would increase the use of tanks, potentially leading to odor events. Increased drilling would increase the frequency of emissions from drilling muds during drilling operations. Some of these types of releases have reached recreational areas surrounding the site and caused Notice of Violations (NOVs) historically. These would be considered a significant, but mitigable impact.

Required Mitigation Measures:

Air Quality mitigation measures AQ.3-1, AQ.3-2, AQ.3-3, AQ.3-4 and AQ.3-5 will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.35 FIRE PROTECTION AND EMERGENCY RESPONSE—RESOURCES

Please refer to EIR Section 4.11 for an analysis of impacts to fire protection and emergency response, including the adequacy of fire protection resources.

Potential Effect and Rationale for Finding:

Resources adequate to respond to an incident might not be available. The Inglewood Oil Field is not required to comply with the most recent fire code requirements due to the age of the facility and grandfathering of code issues. For example, crude oil tanks are not equipped with fire foam as required by the NFPA. Most of the tank farms, with the exception of those in the TVIC area, do not have fire monitors located nearby. The site does not appear to have fire water storage capacity as it relies upon water and water pressure directly from the local water agency. With new development at the site, fire fighting requirements and the potential for fires would increase. The lack of appropriate fire fighting capabilities would be considered a significant impact.

The facility has evacuation plans in place to ensure the safety of the field employees. However, the ability to communicate with surrounding residences and businesses is not in place for the community and this would impede the ability to evacuate neighborhoods in the event of flammable gas releases, crude oil tank fires or other events that might affect neighborhoods. This would be considered a significant impact.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- FP.1-1 The operator shall conduct a complete third-party audit of the facility fire fighting capabilities as per the most recent NFPA requirements, LA County Fire Code, LA County Fire Department Regulations, California Code of Regulation, Culver City Fire Code and Regulations and API requirements, in coordination with the LA County and Culver City Fire Departments. Issues addressed should include, but not be limited to, fire monitor placement, fire water capabilities, fire detection capabilities and fire foam requirements, facility condition in relation to fire fighting ease and prevention. All deficiencies should be addressed in a timely manner as determined by the Fire Departments.

- FP.1-2 The oil field operator shall implement community alert notification system for automatic notification of area residences and businesses in the event of an emergency at the oil field, that could require residents to take shelter or take other protective actions.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.36 FIRE PROTECTION AND EMERGENCY RESPONSE—OIL SPILLS

Please refer to EIR Section 4.11 for an analysis of impacts to fire protection and emergency response, including responses to oil spills.

Potential Effect and Rationale for Finding:

The inability to respond to an oil spill might exacerbate a fire situation. The Inglewood Oil Field equipment to contain a spill is currently described as “limited”. If a spill were to occur, the

inability to contain it might lead to a more serious situation involving ignition sources and subsequent fires. Spill containment relies on outside organizations, whose response time might be as long as 1 hour. This inability to contain a spill would be considered a significant impact.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- FP.2-1 The facility shall develop sufficient spill containment response training and equipment onsite so that the largest spill can be responded to and contained in a timely manner, in coordination with the Fire Department. These programs shall be added to the SPCC.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.37 CULTURAL RESOURCES—HISTORIC STRUCTURES

Please refer to EIR Section 4.12 for an analysis of impacts to cultural resources, including historic structures.

Potential Effect and Rationale for Finding:

Potential future oil development would potentially result in disturbance to the Cone Trust House or other historic structures. The Cone Trust House, a potentially significant historic architectural resource, is located within the Project area. Because the exact location of future oil wells and infrastructure has not been determined, the resource would potentially be impacted during potential future oil development. The house would potentially be demolished depending on the location of future drilling and operational activities. The house would also potentially be impacted by vibration caused by heavy equipment used for grading and/or excavation for future oil wells and infrastructure. This would be a significant impact on historic architectural resources.

Additionally, there may be buildings or structures within the project area related to the early days of the oil industry. Future oil wells and infrastructure changes may affect historic buildings or structures of "industrial historic value" that may qualify as a significant historic architectural resource. This would be a significant impact on historic architectural resources.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- CR.1-1 If feasible, future drilling and operational activities associated with the potential future oil development shall be located at least 200 feet away from the house to avoid disturbances to the Cone Trust House, including potential vibration impacts from nearby equipment.

- CR.1-2 If avoidance is not possible, the Cone Trust House, a potentially significant architectural resource within the PXP Inglewood Oil Field project area, shall be recorded by a qualified Architectural Historian to the standards of The Secretary of the Interior's Standards for the Treatment of Historic Properties. Depending on the extent of proposed drilling and distance to the house, the qualified Architectural Historian may recommend either monitoring during initial drilling and operational activities for potential vibration impacts or relocation if the house would be demolished or severely damaged.

- CR.1-3 If necessary due to the proximity of wells and potential drilling impacts, the historic architectural resource shall be temporarily moved during construction and then relocated to another suitable location within the Project area subsequent to construction. If the structure is relocated within the Project area, a survey shall be conducted after its relocation to document, identify, and describe any internal and external cracking, condition of walls, and other elements as a result of their movement. The survey shall be undertaken under the direction of a qualified Architectural Historian and shall be in accordance with the standards of The Secretary of the Interior's Standards for the Treatment of Historic Properties. A written report documenting conditions after Project completion shall be prepared under the supervision and approval of a qualified Architectural Historian. The report shall provide any necessary measures to address stabilization and repair of areas that have been disturbed during relocation, including photo-documentation. The repairs shall be undertaken by PXP within three months following the relocation of the Cone Trust House.

- CR.1-4 Prior to any change in use of a structure or building related to early oil operations that is over 50 years of age, a qualified architectural historian with knowledge of the oil industry shall evaluate the structure or building for eligibility for listing on the California Register of Historical Resources and provide recommendations to reduce potential impacts based on the proposed use or demolition of such structures.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.38 CULTURAL RESOURCES—SUBSURFACE

Please refer to EIR Section 4.12 for an analysis of impacts to cultural resources, including subsurface resources.

Potential Effect and Rationale for Finding:

Potential future oil development would potentially result in disturbance of unknown potentially significant sub-surface cultural resources. Although no potentially significant archaeological resources were identified within the PXP Inglewood Oil Field project area during the extensive Phase I archaeological field survey, the field survey could not exclude the possibility that unrecorded buried archaeological material could exist and be encountered during grading, clearing, grubbing, and/or other construction activities. If intact cultural remains were

encountered during grading, clearing, grubbing, and/or other construction activities, the potential for destruction of these potential unknown finds would be a potentially significant impact on cultural resources.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- CR.2-1 A series of workshops shall be conducted by a qualified archaeologist. All construction personnel who would work, during any future ground disturbance activities, shall be required to attend a workshop. The workshop shall:
  - review the types of archaeological artifacts that may be uncovered;
  - provide examples of common archaeological artifacts to examine;
  - review what makes an archaeological resource significant to archaeologists and local Native Americans;
  - describe procedures for notifying involved or interested parties in case of a new discovery;
  - describe reporting requirements and responsibilities of construction personnel;
  - review procedures that shall be used to record, evaluate, and mitigate new discoveries; and
  - describe procedures that would be followed in the case of discovery of disturbed as well as intact human burials and burial-associated artifacts.
- CR.2-2 In the event that unknown archaeological artifacts are encountered during grading, clearing, grubbing, and/or other construction activities associated with potential future oil development, work shall be stopped immediately in the vicinity of the find and the resource shall be evaluated by a qualified archaeologist.
- Subsequent to encountering the cultural resource onsite, the applicant shall enter into a contract with a qualified archaeologist. An appropriate Construction Treatment Plan shall be developed and implemented by a qualified archaeologist to ensure that any new discoveries are adequately recorded, evaluated, and, if significant, mitigated.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.39 VISUAL RESOURCES AND AESTHETICS--VIEWS

Please refer to EIR Section 4.13 for an analysis of impacts to visual resources and aesthetics, including views.

Potential Effect and Rationale for Finding:

Future oil field development could degrade public viewsheds. The active oil field production and processing facilities in the Baldwin Hills lie in close proximity to a number of nearby public parks, a state recreation area, and a scenic overlook that contain hiking and walking trails and associated picnic and sports field activity areas. Many of the latter public locations offer public visibility of the Inglewood Oil Field ranging from views of immediately adjacent oil field production facilities to views of such facilities situated at considerably greater distances along viewshed defining ridgelines where they commonly protrude into the skyline. A visual resource issue of concern is the potential obstruction of public views from walking and hiking trails or associated recreation areas. Because of the proximity of recreational facilities to existing oil field operations within the Baldwin Hills, significant visual resource impacts could result from additional site grading of the remaining natural terrain, the removal of natural vegetation, and/or from the introduction of concentrations of additional oil field industrial development that would be perceived as incompatible with adjacent uses, structures, or the existing intensity of development.

While increased oil field production would not likely result in the obstruction of scenic views seen from trails and recreations areas, the placement of additional concentrations of new oil production facilities could result in potentially significant degradation because of the massing of such facilities on the existing visual conditions within selected viewsheds as seen from public trails and recreation areas. Depending upon their location, future production and processing equipment could result in potentially significant visual impacts to public viewsheds.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- V.1-1 Landscaping with native vegetation shall be planted at the periphery of the property for the specific purpose to beautify and screen the operations from adjoining residential, recreational, institutional areas or adjacent public streets or highways. Care should be taken to ensure that the proposed screening does not affect existing desirable views by neighboring properties. A Landscaping Plan shall be prepared addressing screening, irrigation and planting protocols. Drip irrigation and drought tolerant plants shall be used for landscaping. The Landscaping Plan shall be prepared and its implementation and compliance monitored by a certified landscape architect. Landscaping at the site shall be inspected regularly and maintained in good condition.

- V.1-2 All new and existing oil well production sites where new wells are drilled or existing wells are deepened will require the preparation of a site plan application that is reflective of local terrain conditions and that addresses the potential visibility of existing and proposed production facilities from nearby sensitive residential and recreation areas. Landscaping at the site shall be inspected regularly and maintained in good condition. The site plan application shall be submitted to and approved by the Director of Planning to ensure that facilities are adequately concealed from views.

- V.1-3 A screening plan for new or deepened well sites shall be submitted to and approved by the Director. The screening plans shall ensure that, upon completion of the drilling of a new or deepened well, disturbed/graded terrain surfaces at the drill site shall be placed in a clean condition and the area shall be landscaped with appropriate vegetation so as to screen from public view to the maximum extent possible both the well site and any tanks and other permanent equipment that have been installed. The landscaping shall be installed so that it does not interfere with oil pad operations or emergency access to pads. Further, such landscaping shall be routinely inspected and be maintained in good condition.

- V.1-4 All visible structures located at the new or deepened well sites drilled shall be painted non-reflective earth-tone colors or otherwise surfaced with a color and or textured to be compatible with the surrounding area within 30 days of installation. Existing in use facilities shall be painted non-reflective earth-tone colors as approved by the Director of Planning.

- V.1-5 The Applicant shall prepare and implement an unused or abandoned equipment removal plan for equipment that will not be used in the future. This plan will identify all equipment at the site that is no longer in service should be removed. The plan will identify a schedule for removal of the out of service equipment. Unused equipment comprises all equipment, production facilities and above ground piping on the site. In addition, all production facilities that have reached the end of their economic life shall be properly decommissioned. Areas not slated for future use shall be restored and revegetated within 90 days of termination of use.

- V.1.6 Submersible and low profile pumping units shall be used for new wells where the production characteristics of the new well would allow the use of such pumps.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.40 VISUAL RESOURCES AND AESTHETICS—VISUAL CHARACTER

Please refer to EIR Section 4.13 for an analysis of impacts to visual resources and aesthetics, including visual character of the site and its surroundings.

Potential Effect and Rationale for Finding:

Future oil field development could degrade the visual character of the site and its surroundings. The oil field activities as projected by PXP over the next 20 years are not anticipated to vary significantly from those of current operations and many of the projected future activities would make use of existing facilities. Visual impacts associated with the proposed on-going activities within a thoroughly developed oil field are not considered as likely to result in a significant impact to existing views through the degradation of unique on-site visual resources in the Inglewood Oil Field. However, potentially significant visual impacts could result in locations where continued oil field operations may add significantly to the visual clutter of oil field

facilities through the addition and/or expansion of facilities within specific viewsheds as seen from either public or private locations. The addition of oil field production equipment and/or additional grading or other site preparations associated with such activities may create potentially significant visual impacts unless effective visual impact mitigation measures are undertaken that would screen the visibility of new equipment or conceal it from view through the addition of landscaping buffers and/or raised landscaped earthen berms. With the addition of effectively dense landscaping screens designed to lessen the prominent or stark appearance of new oil production equipment, through the planting of vegetative shrub screens along berms or as strategically clustered landscape trees in specified locations situated between sensitive viewing locations and intensified production locations, the visual impact of expanded production facilities would be reduced to less than significant levels.

The prevailing industrial character created by the presence of existing petroleum product storage tanks, above ground pipelines, and processing and handling facilities that have been developed in the Inglewood Oil Field since 1924 have not effectively deterred the encroachment of residential development up to the oil field's boundaries. Residential, commercial, institutional and recreational land uses may each be sensitive to visual impacts associated with the intensification and/or expansion of oil production facilities. While the projected petroleum production activity over the next 20 years within the Baldwin Hills property operated by PXP may not result in a significant visible change to facilities already present on-site, such changes may come to significantly exceed the levels of activity and/or development that currently exists within selected public or private viewsheds. In the event that added oil production facilities are located in closer proximity to surrounding sensitive residential and recreation land use areas without the benefit of effective visual buffers, the increased density of oil production facilities could result in potentially significant adverse visual incompatibility with adjacent uses.

Required Mitigation Measures:

Mitigation Measures V.1-1 to V.1-6 listed above will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.41 VISUAL RESOURCES AND AESTHETICS—LANDFORM ALTERATION

Please refer to EIR Section 4.13 for an analysis of impacts to visual resources and aesthetics, including landform alteration.

Potential Effect and Rationale for Finding:

Future oil field development could result in the alteration of the natural terrain. The Inglewood Oil Field is characterized by an abundance of existing barren and sparsely vegetated cut slopes located along dirt roads that access an equal number of existing hillside and ridge-top drilling/production sites. No new extensive site grading, other than basic site preparation would be needed to accommodate expanded drilling activity at selected new and existing drilling sites. While new site grading would be kept to the minimum needed to safely accommodate a new

production site, the grading of some of the remaining natural slopes and the removal of associated vegetation on them could result in potentially adverse visual impacts. With the establishment of visual landscaping screens (as outlined above) and the requirement to reclaim all production sites once drilling activities are completed, as outlined in the above mitigation measures, the long-term impacts to visual resources would be reduced to less than significant levels.

Required Mitigation Measures:

Mitigation Measures V.1-1 to V.1-6 listed above will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.42 VISUAL RESOURCES AND AESTHETICS—RIDGELINES

Please refer to EIR Section 4.13 for an analysis of impacts to visual resources and aesthetics, including ridgelines.

Potential Effect and Rationale for Finding:

Elements of future oil field development could intrude above viewshed ridgelines. Existing oil field production facilities are visible along ridges and in locations where they intrude into the skyline when viewed from a variety of locations around the edges of the Inglewood Oil Field. Continued oil production activities are not anticipated to change the character or prominence of the existing production, storage and handling facilities that are already in existence. However, the location, added facility concentrations and the application of oil production enhancement activities at selected existing production sites may result in significantly adverse increases of visual resource impacts within either public or private viewsheds. With the application of the enhanced visual resource protection measures delineated in mitigation measures V.1-1 to V.1-5, consisting of such actions as landscaping, painting new and existing equipment with earth-toned colors to decrease their overall visibility, and the establishment of visual buffers in the form of landscaped berms and dense clusters of trees, the potential visual resource impacts associated with enhanced and extended petroleum product production in the Inglewood Oil Field would be reduced to less than significant levels.

Required Mitigation Measures:

Mitigation Measures V.1-1 to V.1-6 listed above will reduce impacts to less than significant levels.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

3.43 VISUAL RESOURCES AND AESTHETICS—NIGHTTIME LIGHTING AND GLARE

Please refer to EIR Section 4.13 for an analysis of impacts to visual resources and aesthetics, including nighttime lighting and glare.

Potential Effect and Rationale for Finding:

Future oil field development could increase nighttime lighting and glare. Visual impacts associated with the alteration of project night-lighting in areas of existing petroleum production activities where expansions and/or the extension of activities would be undertaken are considered to be potentially significant but capable of being mitigated to less than significant levels through the application of existing county regulations requiring the shielding of exterior night lighting and the containment of spill-over lighting from fixed point lighting sources.

Where new oil wells are to be drilled, and operations are scheduled on a round-the-clock basis, lighting of the work site drilling platforms to assure project safety conditions may also create prominent sources of night lighting for the duration of drilling. However, for drilling operations the impacts would be temporary at any one location since the drilling operations are of short duration. Lighting impacts from drilling are considered to be potentially significant but capable of being mitigated to less than significant levels through the application of existing county regulations requiring the shielding of exterior night lighting and the containment of spill-over lighting from fixed point lighting sources. Also, the implementation of the setback requirements discussed in mitigation measure PH.2-1 would also serve to limit nighttime glare for some areas of the oil field that are close to residential areas.

Required Mitigation Measures:

The following required mitigation measures will reduce impacts to less than significant levels:

- V.5-1 All new point lighting sources that may be introduced on-site in support of nighttime operations shall be screened and directed to prevent off-site spillover lighting effects.

- V.5-2 Detailed lighting plan shall be prepared for all new future facilities as well as for future drilling operations, and shall be subject to the review and approval by the Director (Department of Regional Planning) and shall include the following components:

    - Outdoor lighting should be restricted to only those lights which are required by code for the lighting of building exteriors and safety and security needs.

    - Street lighting, pedestrian walkway lighting, and parking lot lighting shall be accomplished using light fixtures that shield and direct light, consistent with public safety needs, to minimize light spill-over effects into adjacent areas.

    - Light standards shall be of a height that produces a light distribution at ground level that considers consistency of light levels for security, spill-over effects, and efficiency.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

SECTION 4 - UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL IMPACTS THAT CANNOT BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

4.1 GEOLOGICAL RESOURCES: SEISMIC

Please refer to EIR Section 4.4 for an analysis of impacts to geological resources, including ground movement due to a seismic events.

Potential Effect and Rationale for Finding:

CEQA requires that the EIR address the impacts of the project on the environment, and does not require an analysis of the impacts of the environment on the project. (*Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464.) Therefore, the EIR was not required to analyze whether earthquakes could have a potential impact on existing or future oil operations and infrastructure.

However, in order to be conservative, the EIR went beyond what CEQA required and analyzed whether ground movement due to a seismic event would potentially induce surface fault rupture, differential settlement, or lateral spreading that could damage components of oil field infrastructure.

The active surface field area is subject to strong seismically induced ground shaking. The Inglewood Oil Field is located in the Baldwin Hills, which were formed as a result of uplift and deformation of sedimentary rock deposits along the seismically active Newport-Inglewood Fault Zone. Portions of this fault zone, including the portion that traverses the southeast active surface field area, have been included within an Alquist-Priolo Fault Zone. Construction within such a zone requires that special geologic studies be conducted to locate and assess any active fault traces in and around known active fault areas prior to development of structures for human occupancy. This fault is capable of generating a maximum earthquake of magnitude 6.0 to 7.4.

The largest and most destructive of the numerous earthquakes that have occurred along the Newport-Inglewood Fault Zone during historic time was the magnitude 6.3 Long Beach earthquake 1933. Other notable earthquakes on this fault zone include the 1920 Inglewood earthquake, as well as earthquakes in the 1940s with which was associated subsurface faulting that damaged oil wells in the Dominguez and Rosecrans oil fields. Numerous other regional faults can be expected to cause seismic shaking in the project area, including the San Andreas Santa Monica-Hollywood-Raymond, Whittier, Palos Verdes, and San Fernando faults. The San Andreas Fault is capable of producing a maximum earthquake in excess of magnitude 8.0, whereas the other faults are capable of producing maximum earthquakes of magnitude 6.4 to 7.1.

With the exception of localized lenses of perched groundwater, groundwater is not present within a depth of 50 feet (15 m) below ground surface; therefore, the likelihood for the occurrence of liquefaction within the active surface field boundary is low. However, elongated structures, such as pipelines, are especially prone to damage as a result of surface fault rupture and seismically

induced differential settlement. In addition, lateral spreading is common in oversteepened slopes comprised of unconsolidated silts and sands, such as is present in the Baldwin Hills. Such seismically induced ground movement may result in potential damage to and/or rupture of Inglewood Oil Field infrastructure. Pipe connections are especially vulnerable to the differing earthquake response between buried pipe and rigid structures. The low earthen embankments used as retention dikes around oil storage tanks are subject to failure from earthquake shaking. Damage to storage tanks is commonly due to the sloshing of liquids that damages or destroys the fixed or floating tank tops. Tank piping often breaks when it does not possess sufficient flexibility. However, gas lines within the Inglewood Oil Field are operating at relatively low pressures, thus minimizing the potential for, and severity of, gas leaks during an earthquake.

Earthquake-related hazards, such as ground rupture, ground acceleration, and ground shaking are common to the Los Angeles region and are not increased by the potential future oil field development. However, because the southeast portion of the site is underlain by the active Newport-Inglewood Fault Zone, there is a greater than average risk of seismic impacts. Therefore, seismic related impacts are significant.

Required Mitigation Measures:

Impacts will be reduced to the greatest extent feasible by the following measures:

- GR.3-1 The steam generation plant, oil cleaning plant, water treating facility, or any other proposed structure (not including wells) shall not be constructed in an Alquist-Priolo Fault Zone without preparation of a fault study by a California Certified Engineering Geologist. Following the investigation, no such structure (not including wells) shall be placed within 50 feet of a known active fault. The fault investigation report shall be submitted to the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, for review and approval.

- GR.3-2 A site-specific geotechnical investigation shall be completed for all proposed permanent structures, including the steam generating facility, oil cleaning plant, water treating facility, and oil storage tanks. The investigation shall include analysis and recommendations associated potential seismically induced ground failure, such as differential settlement and lateral spreading. The geotechnical investigation shall be completed by a California Certified Engineering Geologist and Geotechnical Engineer and submitted to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, for review and approval. In no case shall the steam generating facility, new oil cleaning plant, new water treating facility, or new oil storage tanks be placed within 50 feet of a known active fault.

- GR.3-3 In coordination with the Caltech Seismological Laboratory, the Oil Field Operator shall install and properly maintain an accelerometer at the Inglewood Oil Field to determine site-specific ground accelerations as a result of any seismic event in the region (Los Angeles/Orange County and offshore waters of the Santa Monica Bay and San Pedro Channel). Readings from the accelerometer shall be recorded at the Oil Field and transmitted in real-time to the Caltech Seismological Laboratory. The Oil Field Operator shall cease operations and inspect all onsite oil field-related pipelines, storage

tanks, and other infrastructure following any seismic event that exceeds a ground acceleration at the Inglewood Oil Field of 13 percent of gravity (0.13 g). The Oil Field Operator shall not reinstitute operations of the Inglewood Oil Field and associated pipelines until it can be determined that all oil field infrastructure is structurally sound.

- GR.3-4 The Oil Field Operator shall conduct a seismic assessment of oil tanks, greater than 5,000 barrels, to withstand earthquakes. The seismic assessment shall be prepared by a seismic engineer, approved by Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, and shall comply with the Los Angeles County Building Code. The seismic assessment results and any corrective action plan shall be submitted to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, for review and approval. The corrective action plan shall describe the corrective action to be taken and provide a deadline for the completion of each such corrective action. The Operator shall submit to the Director of the Los Angeles County Public Works, Geotechnical and Hazardous Materials Engineering Division, monthly updates on the corrective action plan until such time as all corrective actions have been completed.

Finding:

CEQA requires that the EIR address the impacts of the project on the environment, and does not require an analysis of the impacts of the environment on the project. (*Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464.) Therefore, the EIR was not required to analyze whether earthquakes could have a potential impact on existing or future oil operations and infrastructure. Any potential impacts of the environment on the project are, therefore, not significant impacts under CEQA.

However, the EIR went above and beyond what was required and found that ground movement due to a seismic event would potentially induce surface fault rupture, differential settlement, or lateral spreading that could damage components of oil field infrastructure.

Mitigation measures GR.3-1, through GR.3-4 would will reduce seismic impacts to the greatest extent feasible impacts, but not necessarily to levels below the significance criterion. Recent earthquakes in the Los Angeles area, such as the magnitude 6.7, 1994 Northridge earthquake, have demonstrated that seismically induced ground failure can result in rupture and/or damage to structures and infrastructure, even with incorporation of modern seismic engineering and proper construction. In addition, because the southeast portion of the site is underlain by the active Newport-Inglewood Fault Zone, there is a greater than average risk of seismic impacts. Therefore, after mitigation, these impacts will remain significant and unavoidable.

SECTION 5 - POTENTIAL CUMULATIVE IMPACTS THAT ARE NOT SIGNIFICANT (NO MITIGATION REQUIRED)

5.1 CLIMATE CHANGE (GREENHOUSE GASES)

Please refer to EIR Section 4.2.7.4 for an analysis of cumulative impacts that future development could have on global climate change and greenhouse gas emissions.

Potential Cumulative Effects and Rationale for Finding:

It is possible that greenhouse gas emissions associated with the potential future development (from construction or operations), when combined with emissions throughout the area, California and the world, might contribute to climate change. While globally climate change is, by definition, a significant cumulative environmental impact and the impacts of climate change on California human and natural systems would also be significant, there currently is no agreed-upon methodology to adequately identify, under CEQA, when project-level greenhouse gas emissions contribute considerably to this significant cumulative impact. Thus, at this time, it would be speculative to determine if the potential greenhouse gas emissions associated with the potential development would or would not contribute considerably to this significant cumulative impact.

Finding:

The future development and related projects will not result in significant cumulative impacts to global climate change and greenhouse gas emissions.

5.2 LAND USE

Please refer to EIR Section 4.8.7 for an analysis of cumulative impacts to land use.

Potential Cumulative Effects and Rationale for Finding:

As explained above, the future oil and gas production would not create any significant impacts with the implementation of mitigation measures. Projects that could create cumulative land use impacts are those that would contribute to an incompatibility with the land uses in the vicinity of the oil field subject of the CSD. The only cumulative project that is in close proximity to the Inglewood Oil Field is the Los Angeles College Expansion Project. None of the proposed residential, commercial and institutional projects listed in Table 2.9 of the EIR would be incompatible in scale, use or characteristics with the proposed CSD; therefore, cumulative land use impacts are expected to be less than significant. Projects similar to the cumulative projects have coexisted with the oil field for many years and the CSD would only contribute to the minimization of potential land use impacts at the site and surrounding areas.

Finding:

The project and related projects will not result in significant cumulative impacts to land use.

5.3 RECREATION

Please refer to EIR Section 4.10.6 for an analysis of cumulative impacts to recreational facilities.

Potential Cumulative Effects and Rationale for Finding:

The cumulative projects list provided in Table 2.9, identifies a number of residential and commercial facilities planned for areas in the vicinity of the Inglewood Oil Field. The primary source of increased demand for recreational facilities would be generated by new residential

development. The residential projects on the cumulative projects list are in the City of Los Angeles, County of Los Angeles and Culver City.

Los Angeles is park poor with fewer acres of parks per 1,000 residents compared to any major city in the country. There are also vast disparities in access to parks and recreation based on race, ethnicity, and other relevant factors. For example, the African-American community just east of the Baldwin Hills Park is particularly park-starved, with between 0.3 and 0.4 acres of parks per thousand residents, compared to 1.7 acres in disproportionately white, relatively wealthy parts of Los Angeles.

Within a five mile radius of the Baldwin Hills there is only one picnic table for every 10,000 people, one playground for 23,000 children, one soccer field for 30,000 people and one basketball court for 36,000 people. On weekends and especially on holidays, the gates to Kenneth Hahn State Recreation Area often close before noon because the heavily used park has simply run out of space.

Given this lack of parks within the Baldwin Hills area, it is likely that the cumulative residential developments would increase the burden on the local parks that could lead to physical deterioration of the existing recreational facilities, which would be a cumulatively significant impact.

For private developments within Culver City, the City requires contribution of park land from new private developments and/or in-lieu fees to help meet this demand, thereby helping to offset cumulative impacts of new development on local parks.

The potential future oil development will not produce any new residents that would require the construction or expansion of recreational facilities or increase use that would cause substantial physical deterioration of facilities. Therefore, the project's incremental contribution to the cumulative recreational impacts is considered less than significant.

Finding:

The project and related projects will not result in significant cumulative impacts to recreational facilities.

5.4 FIRE PROTECTION AND EMERGENCY RESPONSE

Please refer to DEIR Section 4.11.6 for an analysis of cumulative impacts to fire protection and emergency response.

Potential Cumulative Effects and Rationale for Finding:

Cumulative projects that could impact the fire protection analysis include projects that would draw on the same resources as those that would be used to provide emergency response at the Inglewood Oil Field. The primary responder for the majority of the Inglewood Oil Field is the Los Angeles County Fire Department. The majority of the cumulative projects listed in Table 2.9 are located in Culver City, which would rely on the Culver City Fire Department as the

primary respondent. One of the cumulative projects in Culver City is a new fire station that would increase the fire fighting and emergency response capabilities in the City.

The potential future oil development at the Inglewood Oil Field is expected to be similar to the type of development that has been occurring at the site for the past decades and would not be expected to increase the demand for fire protection services over the baseline conditions. The largest fire risk at the Inglewood Oil Field is the gas plant and the crude oil storage tanks. The potential future oil development would not increase the size of the gas plant and therefore, the emergency response would not change relative to the baseline. It is possible that some new crude oil tanks could be built in the future, but they would likely replace existing tanks, and as such, the emergency response for the oil tanks would remain the same as the baseline. As such, the incremental contribution to emergency response is considered to be zero, and by definition not cumulatively considerable. In addition, the implementation of the mitigation measures discussed above with respect to project-only impacts would serve to improve the overall fire protection and emergency response over what exists today for the Inglewood Oil Field. Therefore, cumulative impacts are considered to be less than significant.

Finding:

The project and related projects will not result in significant cumulative impacts to fire protection and emergency response.

5.5 VISUAL RESOURCES AND AESTHETICS

Please refer to DEIR Section 4.13.6 for an analysis of cumulative impacts to visual resources and aesthetics.

Potential Cumulative Effects and Rationale for Finding:

Cumulative projects that could impact the current analysis include the existing industrial/oil and gas facility as well as a number of commercial, industrial and residential projects listed in Table 2.9 of the EIR. The proposed cumulative projects will occur within a built out urban environment and are essentially infill development. Cumulative impacts of a project are realized by affecting the same viewshed as that which the proposed project affects or by deteriorating the existing views. The potential future oil field development will look very similar to the existing oil and gas development existing at the site and the project's incremental contribution to visual impacts would less than significant. In fact, proposed mitigation measures will serve to alleviate some of the existing visual impacts creating an overall improvement over existing views. None of the proposed commercial, industrial or residential projects when added to the potential future development of the site are likely to meaningfully impact views in the area. Therefore, the cumulative impacts associated with visual resources are considered less than significant.

Finding:

The project and related projects will not result in significant cumulative impacts to visual resources and aesthetics.

5.6 PUBLIC SERVICES AND UTILITIES

Please refer to DEIR Section 4.14.6 for an analysis of cumulative impacts to public services and utilities.

Potential Cumulative Effects and Rationale for Finding:

The proposed residential and commercial projects in the area would have a need for water, would produce wastes and wastewater; however, these projects would have to go through their own approval process and their utilities needs would be evaluated against the available capacity.

With regard to what, the cumulative projects listed in the EIR appear to be outside of the Cal American Water service area, and as such would not result in cumulative impacts to water supplies for the water company that services the Inglewood Oil Field. As such, there would not be a cumulative impact on water supplies provided by Cal American Water.

Other cumulative development in the service area of the City of Los Angeles Bureau of Sanitation service area would increase the demand on the wastewater conveyance system and the Hyperion Treatment Plant. Cumulative projects in the area that may create impacts to the wastewater system include those listed in Table 2.9 of the EIR. The potential future oil development would generate produced water associated with the production of oil and gas. All of this waster would be injected back into the reservoir. None of the produced water would be sent to the Hyperion Treatment Plant. In addition, the future development would not include the construction of any new structures requiring sanitary sewer connections. The existing sewage generated onsite is not expected to change with the potential future oil development activities. Therefore, the potential future oil development would not contribute to any cumulative wastewater treatment facility impacts.

Finding:

The project and related projects will not result in significant cumulative impacts to public services and utilities.

5.7 ENERGY AND MINERAL RESOURCES

Please refer to DEIR Section 4.15.6 for an analysis of cumulative impacts to energy and mineral resources.

Potential Cumulative Effects and Rationale for Finding:

Construction phases of all the other projects in the area, detailed in section 2.0, Project Description of the EIR, would use diesel and gasoline fuel for commuter vehicles and machinery. However, construction is typically short and even cumulatively is not expected to significantly impact energy resources.

The residential projects would use small amounts of energy, but those are part of planned development in Los Angeles County, and are permitted based on the availability of such resources. Thus, energy impacts would be cumulatively less than significant.

Finding:

The project and related projects will not result in significant cumulative impacts to energy and mineral resources.

5.8 ENVIRONMENTAL JUSTICE

Although not required by CEQA, the EIR contains a discussion of environmental justice. Please refer to EIR Section 4.16.6 for an analysis of cumulative impacts to environmental justice.

Potential Cumulative Effects and Rationale for Finding:

Cumulative projects that could impact the analysis include projects that would impact the same populations as those that would be impacted by the potential future development at the Inglewood Oil Field. Most of the cumulative projects are small residential and commercial development projects that would not be expected to substantially impact the risk or public health of the study are populations. Therefore, cumulative impacts are considered to be less than significant.

Finding:

The project and related projects will not result in significant cumulative impacts to environmental justice.

SECTION 6 - POTENTIAL CUMULATIVE IMPACTS THAT HAVE BEEN MITIGATED TO A LEVEL OF INSIGNIFICANCE

6.1 SAFETY AND RISK OF UPSET

Please refer to EIR Section 4.1.6 for an analysis of cumulative impacts from safety and risk of upset from hazardous materials.

Potential Cumulative Effects and Rationale for Finding:

The safety and risk impacts that have been identified for the potential future oil development are related to hazards associated with the release of propane and other gas liquids as well as the potential for increased risk of an oil spill. Cumulative projects that could impact the safety and risk analysis include commercial, industrial, educational, as well as residential projects. For risk of upset and safety, impacts of a cumulative project are realized by either increasing the frequency or volume of oil spills into the same environment as the potential development, increasing the public safety risks to the same populations as the potential development, or increasing the receptor populations that could be affected by the future field operations.

Of the 39 identified cumulative projects, only a proposed gas station in Culver City could involve the handling of propane that in turn could increase public risk from a release. Gas stations that handle propane typically have only small storage tanks. A release from a typical gas station propane storage tank would not impact the same population that could be affected by a release from the Inglewood Oil Field propane tanks.

None of the cumulative projects are within the worst case hazard zones associated with the gas plant and propane tanks. The nearest cumulative project is the West Los Angeles College expansion project, which is approximately 4,100 feet from the gas plant. None of the cumulative projects would increase the receptor population within the hazard zones associated with the potential future oil field operations.

In addition, none of the cumulative projects would involve the production or handling of crude oil. As such, they would not increase the cumulative oil spill risk. With the implementation of the mitigation measures discussed above for the potential future oil development, the cumulative safety and risk impacts would be reduced to less than significant levels.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.2 AIR QUALITY

Please refer to EIR Section 4.2.6 for an analysis of cumulative impacts to air quality.

Potential Cumulative Effects and Rationale for Finding:

Of the cumulative projects listed in the EIR, it is likely that they would all be constructed before the construction of the potential future steam drive, water treatment, and oil cleaning plants. These facilities are projected for construction five to ten years out. As such, they would not combine with the potential future construction impacts. The Air Quality Management Plan anticipates growth and associated construction in the region, consistent with the Southern California Association of Governments projections. Each project must be evaluated for the need for consistency and CEQA analysis, and mitigation measures applied to reduce construction impacts, where appropriate. With the implementation of the mitigation measures identified above the for potential future oil development, cumulative construction air quality impacts would be considered less than significant.

Cumulative projects that are included in adopted general and regional plans would be included in the SCAQMD projections for the region. Individual projects (previously planned or not) must be evaluated for the need for CEQA analysis, and mitigation measures applied, where appropriate. Further, the AQMP and continuing updates of that plan are required to include air emission reduction strategies for the basin (such as increased stationary source emissions controls, improved vehicle emission standards, transportation alternatives, etc.). These, in concert with individual project mitigation measures will help reduce impacts. However, until the south coast air basin as a whole attains all federal and state standards, which is not anticipated to occur until 2020, it is likely that the air emissions from the cumulative project would be significant. For the potential future operational emissions at the oil field a mitigation measure has been required that offsets and the RECLAIM program be used, which will assure that potential future operational

emissions will not result in a net increase in air emissions within the Los Angeles air basin. In addition, the potential future oil development would not require any General Plan amendment and hence is within the Southern California Association of Governments projection, and therefore would be considered consistent with the Air Quality Management Plan. As such, the potential future oil development's contribution to cumulative air emission would be less than significant with mitigation.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.3 PUBLIC HEALTH

Please refer to EIR Section 4.3.6 for an analysis of cumulative impacts to public health.

Potential Cumulative Effects and Rationale for Finding:

Of the cumulative projects listed in the EIR, it is likely that they would all be constructed before the construction of the potential future steam drive, water treatment, and oil cleaning plants. These facilities are projected for construction five to ten years out. As such, they would not combine with the potential future construction air toxic impacts. Therefore, potential cumulative impacts of project construction would be less than significant.

None of the cumulative projects would be major sources of air toxic contaminants since they are mainly commercial and residential development. In addition, none of the cumulative projects are close enough to the Inglewood Oil Field where the combined air toxic emissions would have a cumulative effect on the same receptors. Therefore, with the implementation of the mitigation measures listed above, the cumulative impacts on public health risk for air toxic emission would be considered less that significant with mitigation.

In addition, the results of the HARP modeling are shown in Table 4.3.3 and Figure 4.3-4 of the EIR. Overall, worst-case health risk associated with potential future oil field operations are well below all applicable health risk criteria. The estimated health risk associated with potential future operations also represents a relatively small fraction of the overall air toxic health risk in the region identified in the MATES III study. The Inglewood Oil Field cancer risk of 5.5 cancer cases per million represents 0.6 percent of the excess cancer risk of 730 in the vicinity of the project site, 0.75 percent of the excess cancer risk of 1,400 at the Central Los Angeles monitoring site, 0.37 percent of the excess cancer risk of 1,200 at the Compton monitoring site and 0.73 percent of the excess cancer risk of 750 at the North Long Beach monitoring site.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.4 GEOLOGICAL RESOURCES

Please refer to EIR Section 4.4.6 for an analysis of cumulative impacts to geological resources.

Potential Cumulative Effects and Rationale for Finding:

Many geological hazards, such as unstable soils, ground shaking, liquefaction, and lateral spreading are site specific in nature and do not contribute to cumulative impacts. The only cumulative project that is located close enough to the Inglewood Oil Field to directly compound any of the potential geology or soils impacts from potential future oil development is the expansion of the West Los Angeles City College Campus. This project will require grading plans and is required to implement various mitigation measures such that the grading and geotechnical impacts resulting from construction will be less than significant. These measures combined with the mitigation measures identified above for the potential future oil development would assure that the cumulative geotechnical impacts are less than significant.

With respect to ground movement (subsidence and uplift) and gas ,migration only the West Los Angeles City College Campus Expansion Project is immediately adjacent to the Inglewood oil field. The remaining cumulative projects would not be exposed to a greater (or even similar) risk related to gas migration and subsidence, which is the same as most other areas in Southern California The West Los Angeles City College Campus Expansion Project has incorporated mitigation measures to render these impacts less than significant (West LA College Facilities Master Plan EIR 2003).

In addition, the mitigation measures identified for the potential future oil development would limit potential ground movement from oil field operations in the vicinity of the Inglewood Oil Field to less than significant levels. In addition, the remainder of the cumulative projects would not compound (due to the distances involved) the specific effects that could occur on the Inglewood Oil Field site. With the incorporation of the proposed mitigation measures for ground movement (subsidence/uplift) the cumulative impacts would be considered less than significant with mitigation.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.5 BIOLOGICAL RESOURCES

Please refer to EIR Section 4.5.6 for an analysis of cumulative impacts to biological resources.

Potential Cumulative Effects and Rationale for Finding:

All of the cumulative projects listed in Chapter 2 (Table 2.9) of the EIR are infill projects, and none are locations where sensitive biological resources have been recorded. Therefore, the potential that any of these projects would result in disturbance of potentially suitable habitats that support special-status plant or wildlife species is unlikely. In addition, each project will be subject to CEQA review and will incorporate mitigation measures as appropriate. With the implementation of the mitigation measures identified above for the potential future oil development, cumulative biological impacts would be considered less than significant with mitigation.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.6 WATER RESOURCES

Please refer to EIR Section 4.6.6 for an analysis of cumulative impacts to water resources.

Potential Cumulative Effects and Rationale for Finding:

The cumulative projects listed in Table 2.9 of the EIR represent a mix of residential, commercial, and institutional projects, with some open space and associated recreational land uses, which will have various changes in the potential surface water quality degradation. Continued redevelopment, infill, and urbanization of the Ballona Creek Water Management Area are expected to have significant cumulative water quality impacts to Ballona Creek. The Inglewood Oil Field, which comprises 1 percent of the Ballona Creek Watershed, has a number of retention basins that collect the majority of the runoff from the active surface field property. These retention basins limit the amount of sediment that is released to the downstream watershed. In addition, the releases from the retentions basins are regulated under an NPDES permit that sets strict standards for the quality of the water that can be released down stream. The discharge requirements for these retention basins along with the implementation of the mitigation measures identified above with respect to project-only impacts, limit the potential future oil development's contribution to the cumulative water quality impacts to less than significant with mitigation.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.7 NOISE AND VIBRATION

Please refer to EIR Section 4.9.6 for an analysis of cumulative noise and vibration impacts.

Potential Cumulative Effects and Rationale for Finding:

All of the cumulative projects listed in Table 2.9 of the EIR are within urbanized areas of the Los Angeles Basin. The cumulative projects are primarily residential, commercial, or institutional, and the major noise source associated with these projects would be from their associated traffic. The cumulative projects combined with the ambient growth in traffic could lead to an increase in noise in the vicinity of local roadways. However, it is likely that this change in traffic noise would be less than 5 dBA, which is the significance threshold. The cumulative analysis in the West Los Angeles College Facilities Master Plan estimated that the cumulative noise increase along local roadways in the vicinity of the oil field would be approximately 3 dBA (West Los Angeles College Facilities Master Plan, 2003).

The West Los Angeles College Expansion Project is the only cumulative project that is close enough to the facility to be affected by the operational noise. With the expansion of the College, more students and faculty will be using the campus, which would increase the number of people who could be affected by noise from the oil field operations. With the implementation of the mitigation measures discussed with respect to project-only impacts, the cumulative noise impacts would be less than significant with mitigation.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

6.8 CULTURAL RESOURCES

Please refer to EIR Section 4.12.6 for an analysis of cumulative impacts to cultural resources.

Potential Cumulative Effects and Rationale for Finding:

Cumulative projects that could impact cultural resource analysis include industrial, commercial, as well as residential projects. Some of the related projects fall near localities in which cultural

resources have been recorded. Therefore, there is a potential that any project that results in subsurface disturbance would have the potential to significantly impact an important resource, and contribute to the progressive loss of cultural resources. However, the majority of such impacts, where significant, are expected to be addressed and reduced to a less than significant level through standard conditions and mitigation measures. These measures generally provide for onsite evaluation of resources, recovery and archiving of important resources, possible avoidance and preservation-in-place, and monitoring during remedial grading and excavation activities. Accordingly, cumulative impacts on cultural resources will be less than significant after mitigation.

The proposed project, with the incorporation of mitigation measures CR.1-1, CR.1-2, CR.1-3, CR.1-4, and CR.2-1, described above would not contribute to any potentially significant cultural or historic impact. Therefore, the projects contribution to cumulative cultural and historical resources would be less than significant with mitigation.

Required Mitigation Measures:

The same mitigation measures imposed for project-only impacts will mitigate for cumulative impacts. See Section 3 above.

Finding:

For the foregoing reasons, the Board adopts Finding 1.

SECTION 7 - CUMULATIVE IMPACTS THAT CANNOT BE MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

7.1 TRANSPORTATION AND CIRCULATION

Please refer to EIR Section 4.7.5 for an analysis cumulative traffic impacts.

Potential Effect and Rationale for Finding:

The future cumulative analysis includes other development projects located within the study area that are either under construction and/or planned. It should be noted that this CSD, or any actions taken by the County regarding the CSD, would not have a direct bearing on these other proposed related projects.

To evaluate future traffic conditions with the cumulative projects, estimates of the peak hour trips generated by the projects were calculated by applying Institute of Transportation Engineers (ITE) traffic generating rates, as applicable. The future traffic volumes in the study area without the project for the morning and evening peak hours, respectively, are shown in Figures 4.7-14 and 4.7-15 in the EIR.

Tables 4.7.11 and 4.7.12 in the EIR summarize the future traffic conditions plus ambient growth plus related projects without the potential future oil field development and future traffic conditions with the future oil field development, respectively. As shown, related projects without the future oil field development would increase the traffic growth at the study

intersections in excess of the significance levels and no improvements have been identified to reduce these impacts.

Using the thresholds established in Table 4.7.3 of the EIR, Significant Impact Criteria For Signalized Intersections, the analysis determined that the added traffic volumes generated by the worst case potential future oil field development condition would significantly impact the traffic flow at all of the study intersections during the existing plus ambient growth plus related projects plus future oil field conditions, described in Table 4.7.12 and shown in Figures 4.7-16 and 4.7-17 in the EIR.

If all the mitigation measures identified below are implemented the future conditions with related projects and potential future oil field development would potentially reduce the impacts to below a level of significance at the four intersections, except for the Stocker St. and La Brea/Overhill PM peak hour, which remains a significant cumulative impact. For that reason, the cumulative traffic and circulation impacts would be considered significant and unavoidable.

Required Mitigation Measures:

Cumulative traffic impacts will be reduced to the greatest extent feasible by the following measures.

The proposed fair share contributions would go to the following traffic and intersection improvements:

- La Cienega Boulevard & Stocker Street – Convert the single southbound left turn to a dual left turn lane. The north leg of La Cienega Boulevard would need to be widened to implement this improvement. The right of way required to provide this improvement is under the control of the oil field. The oil field contributes 0% of the cumulative impact during the AM peak hour and a 14% contribution to this cumulative impact during the PM peak hour.

- Fairfax Avenue & Stocker Street – Install a dedicated eastbound right turn lane and additional westbound through lane. This would alter the eastbound approach from a left, through and shared through/right turn lane to a left, two through lanes and a right turn lane. The westbound approach would be altered from a left, through and shared through/right turn lane to a left, two through and a shared through/right turn lane. Implementation of these improvements would require additional right-of-way under the jurisdiction of the Baldwin Hills Oil Fields. The oil field contributes 16% of the traffic to this cumulative impact during the AM peak hour and no traffic during the PM peak hour.

- Stocker Street & La Brea Avenue/Overhill Drive – Install a northbound right turn lane on Overhill Drive. This would alter the approach of northbound Overhill Drive from two through and a shared through/right turn lane to three through and a right turn lane. This improvement is not yet feasible due to lack of right-of-way, which is currently not available. The project contributes 8% during the AM peak hour and 3% during the PM peak hour to this cumulative impact.

- Fairfax Avenue & Slauson Avenue – Install a north and southbound left turn lane and an east and westbound right turn lane. This would alter the existing lane configurations from a southbound single lane to a left and shared through/right turn lane, the northbound approach from a shared left/through and right to a left, through and right turn lane, the east and westbound approach from a left, two through and shared through/right turn lane to a left, three through and a right turn lane. These improvements may require additional right-of-way, which is currently not available. The project contributes 0% during the AM and PM peak hours to this cumulative impact.

Implementation of the improvements mitigates the cumulative and potential oil field development conditions to a level of insignificance at the intersection of Stocker Street and La Cienega Boulevard and at Stocker Street and Fairfax Avenue once the improvements are in place. The improvements at Stocker Street and La Brea Avenue/Overhill Drive and Fairfax Avenue and Slauson Avenue are not feasible at this time. Since the oil field is only one contributor to this cumulative impact, the improvements are likely to not be in place until the improvements are fully funded. Therefore, significant unavoidable cumulative traffic impacts continue to occur at all four intersections.

Finding:

Implementation of the mitigation measures will reduce Project related impacts to the greatest extent feasible. After mitigation, cumulative traffic impacts will remain significant and unavoidable.

SECTION 8 - GROWTH-INDUCING IMPACTS OF THE ACTION

Section 15126.2(d) of the State CEQA Guidelines requires that an EIR "discuss the ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Please refer to DEIR Section 7.2 for an analysis of the potential growth-inducing impacts of the project.

In general terms, a project may induce spatial, economic or population growth in a geographic area if it meets any one of the four criteria: (1) removal of an impediment to growth (e.g., establishment of an essential public service or the provisions of new access to an area); (2) economic expansion or growth (e.g., changes in revenue base, employment expansion, etc.); (3) establishment of a precedent setting action (e.g., an innovation, a change in zoning or general plan amendment approval); or (4) development or encroachment in an isolated area or one adjacent to open space (being different from an "infill" type of project).

The project does not remove an impediment to growth. The proposed project is the implementation of a CSD that would set standards and requirements to guide future development at the Inglewood Oil Field. As such, the CSD itself would not remove an impediment to growth since it would only provide additional regulation for an existing oil field. Furthermore, any future oil production would not remove an impediment to growth. Future development at the Inglewood Oil Field could involve the drilling of oil production wells, water injection wells, and installation of new equipment at an existing facility. Future development could increase the volume of oil and gas being handled by the facilities from what is occurring today. Future

development would not result in the establishment of an essential public service, and would not provide new access to an area previously inaccessible. As a result, future development at the Inglewood Oil Field would not be considered to remove an impediment to growth.

The proposed project would not result in economic growth. The proposed project is the implementation of a CSD that would set standards and requirements to guide future development at the Inglewood Oil Field. As such, the CSD itself would not result in economic growth since it would only provide additional regulation for an existing oil field. Economic growth could occur in the area during future development activities because of construction workers and associated support services. Employment due to future activities at the Inglewood Oil Field would be limited to increased labor for the drilling operations. There would be no new significant operational employment associated with future development at the oil field. The drilling activities could result in some short-term increase to the area's existing revenue base. Given the limited increase in local expenditures associated with the drilling activities, the economic growth associated with future development at the Inglewood Oil Field would not be considered significant.

The CSD would not result in a precedent setting action. The proposed project is the implementation of a CSD that would set standards and requirements to guide future development at the Inglewood Oil Field. Oil development, including drilling, is an allowed use under Los Angeles County zoning and would occur in the future at the oil field even if a CSD is not adopted. Future development at the Inglewood Oil Field could involve the production of oil and gas from an existing facility, and would not involve the expansion of the surface boundaries of the existing oil field. Given that this is an existing oil field operation that would not expand the current surface footprint, and is a permitted use under the Los Angeles County zoning, future development at the Inglewood Oil Field would not be considered a precedent setting action.

The CSD would not result in the development of open space. Development of open space is considered growth inducing when it encroaches upon urban-rural interfaces or in isolated localities. Implementation of a CSD would not result in the development of any open space. Future development of the Inglewood Oil Field would be done within the existing surface footprint of the facility. Therefore, the neither the CSD nor future development of the Inglewood Oil Field is considered to be growth inducing under this criterion since future oil development would not cause new encroachment upon open spaces.

Neither the CSD nor future development at the Inglewood Oil Field meets any of the four growth inducing criteria specified above. As a result, they are not considered to be growth inducing.

SECTION 9 - FINDINGS REGARDING ALTERNATIVES

Under State CEQA Guidelines Section 15126.6, a description of a range of reasonable alternatives to the Project or location of the Project, which would feasibly attain most of the objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives, must be included in an EIR. A No Project alternative must be evaluated along with its impact.

In addition to specifying that the EIR evaluate "a range of reasonable alternatives" to the Project, Section 15126.6(c) requires that an EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process.

A typical EIR would evaluate the proposed project to identify significant environmental effects, and then develop a range of alternatives that would substantially lessen any of the significant effects of the project. In this case, the proposed project is a CSD, which would not result in any physical change to the environment, and would serve to reduce environmental impacts of future development at the Inglewood Oil Field through the establishment of permanent development standards, operating requirements and procedures. As such, the CSD itself does not have any significant environmental effects since it is a regulatory scheme designed to minimize environmental impacts of the future operations at the Inglewood Oil Field.

Since the proposed project is the CSD, the alternative analysis has looked at alternative regulatory schemes that Los Angeles County could implement to establishing development standards, operating requirements, and procedures to regulate future development at the Inglewood Oil Field.

The alternatives included in the DEIR are (1) No Project Alternative, (2) Site Plan Review with Director Approval, and (3) Conditional Use Permit.

Project Objectives

The following represent the objectives for the project:

- To complete and implement a CSD that would establish permanent development standards, operating requirements and procedures for the portions of the Inglewood Oil Field that are within Los Angeles County.

- To provide a means for implementing enhanced regulations to appropriately regulate oil field operations and drilling, minimize impacts to the public health and safety, and address the unique compatibility concerns associated with operating an oil field in the midst of urban development.

- To supplement the existing County, State and Federal regulations that PXP must comply with as part of their oil field operations.

9.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Under the No Project Alternative, no CSD would be adopted and Los Angeles County would continue to permit future oil field development using the process that was in place prior to the Emergency Interim Ordinance. Oil drilling and production is a permitted use under the current A-2 zoning. For new wells, the oil field operator is required to get a well permit from the County Fire Department. In addition, the oil field operator is required to get a grading permit from the Department of Public Works if grading activities will exceed 5,000 cubic yards in any calendar year. Both of these permits are considered ministerial.

The A-2 zone does not require a formal Director's review for oil wells (County Code 22.24.120); those projects would typically undergo a site plan review only if the project is referred to Division of Regional Planning by another agency, such as the Department of Public Works or the Fire Department as part of their permitting process. Historically, no site plan reviews had taken place for oil field development at the Inglewood Oil Field until Emergency Interim Ordinance 2006-0050U – adopted by the Board of Supervisors on June 27, 2006 – temporarily placed a site plan review requirement for drilling operations. (This Emergency Interim Ordinance was later extended and amended by Interim Ordinance 2007-0064U to impose a limited moratorium on new drilling and deepening of existing wells.) Therefore, under the "no project alternative," oil or gas wells would undergo a site plan review upon referral from another agency. The purpose of the site plan review would be to ensure compliance with the A-2 development standards for oil wells. It would be a staff level review without the ability to approve with conditions.

Under the No Project Alternative, the oil field operator would submit well permit requests for a group of wells and associated ancillary systems to the Los Angeles County Fire Department. The oil field operator would also submit a grading permit request to the Los Angeles County Department of Public Works if the grading exceeded 5,000 cubic yards. These agencies would review the applications and issue the permits. As part of the permitting process, both these County agencies could ask the Department of Regional Planning to conduct a site plan review. This site plan review would be limited to ensuring that the proposed development was consistent with the A-2 development standards for oil wells (County Code 22.24.120). All of these permitting activities are considered ministerial, and therefore, are not subject to CEQA.

Comparison to Project Objectives

The No Project Alternative Permitting process does not address the potential future development that could occur at the oil field, which would provide a better understanding of the cumulative effects. The benefit of understanding the cumulative effects of potential future oil field development is that impacts that may not be significant for a small set of development could be significant when the development is increased. By understanding the full range of impacts associated with potential future development at the oil field, a more comprehensive set of regulatory standards and conditions can be developed.

Under a CSD, the oil field operator would have a set of permanent development standards, operating requirements and procedures that the oil field operator would have to follow to plan future development. The use of the No Project Alternative regulatory scheme, would not provide

this type of guidance for planning future development, but rather would rely on the development standards that are currently in the County Code.

The implementation of a CSD, which is developed based upon an environmental analysis of potential future oil field development impacts, will result in more comprehensive development standards, operating requirements and procedures than the standards that are currently in the County Code.

9.2 ALTERNATIVE 2: SITE PLAN REVIEW WITH DIRECTOR APPROVAL

Under this alternative, no CSD would be adopted, and Los Angeles County would have to modify the current Agricultural 2 zoning to require a site plan review approved by the Director of Regional Planning for oil field operations. This is the system that was put into place as part of the Emergency Interim Ordinance. A site plan review by the Director is addressed in Section 12 of Chapter 22.56 of the Los Angeles County Code. The purpose of the site plan is to determine whether or not a proposed development will properly comply with the provisions and development standards prescribed in the existing County Code.

The Director, in acting upon any site plan can approve, approve with conditions, or deny the proposed development. The decision that the Planning Director makes is with regard to whether a site plant is following the principles and standards delineated in the existing County Code as follows:

1. That the use, development of land and/or application of development standards is in compliance with all applicable provisions of Title 22 of the Los Angeles County Code;

2. That the use, development of land and/or application of development standards, when considered on the basis of the suitability of the site for the particular use or development intended, is so arranged as to avoid traffic congestion, insure the protection of public health, safety and general welfare, prevent adverse effects on neighboring property and is in conformity with good zoning practice;

3. That the use, development of land and/or application of development standards is suitable from the standpoint of functional developmental design. (Ord. 1494 Ch. 5 Art. 8 § 508.4, 1927.)

Under this alternative, the oil field operator would submit site plan reviews for groups of wells and associated ancillary systems similar to the process that has been used historically. The site plan review process is considered ministerial, and therefore, is not subject to CEQA. As part of each site plan review, Los Angeles County could place conditions on the development, but the conditions would be limited to what was being applied for in the site plan.

Comparison to Project Objectives

The site plan review process does not address the potential future development that could occur at the oil field, which would provide a better understanding of the cumulative effects. The benefit of understanding the cumulative effects of potential future oil field development is that impacts that may not be significant for a small set of development could be significant when the

development is increased. By understanding the full range of impacts associated with potential future development at the oil field, a more comprehensive set of regulatory standards and conditions can be developed.

Under a CSD, the oil field operator would have a set of permanent development standards, operating requirements and procedures that the oil field operator would have follow to plan future development. The use of site plan reviews only, would not provide this type of guidance for planning future development.

The requirements of the CSD could be such that future well drilling and installation of ancillary infrastructure could be subject to site plan review, similar to what was in the Emergency Interim Ordinance, with the added benefit of development standards specifically adopted to mitigate any potential project impacts. This would have to be spelled out in the CSD provisions.

The implementation of a CSD, which is developed based upon an environmental analysis of potential future oil field development impacts, will result in more comprehensive development standards, operating requirements and procedures than a site plan review only. In essence, the CSD would provide a more comprehensive set of development standards that would supplement the site plan review process for individual projects at the oil field.

9.3 ALTERNATIVE 3: CONDITIONAL USE PERMIT

An alternative scheme for regulating the Inglewood Oil Field would be to issue a Conditional Use Permit (CUP) that would cover the future development specified in the CUP application. A "conditional use," as defined by this Title 22 of the County Code, means a use which because of characteristics peculiar to it, or because of size, technological process or type of equipment, or because of its location with reference to surroundings, street or highway width, traffic generation or other demands on public services, requires special consideration. Depending upon the characteristics of the individual site and location within the zone where the development is proposed, the request for a conditional use permit may be approved without conditions, or approved with conditions, or denied. (Ord. 82-0024 § 7, 1982: Ord. 1494 Ch. 5 Art. 1 § 501.1, 1927.)

Under the CUP Alternative, the oil field operator would submit an application to Los Angeles County for a conditional use permit. The application would most likely include a limited set of development, such as the development of well and ancillary infrastructure that is required over the next few years. It is unlikely that the CUP application would cover a 20 year period of development since the oil field operator would not know exactly what development would occur over that time period. The determination of well locations and the types of ancillary infrastructure required in an oil field is based upon many different variables that include the performance of the existing wells, information on the producing reservoir, capacity and location of existing infrastructure, price of oil, etc.

An application for a CUP is a discretionary action subject to a duly noticed public hearing that is subject to CEQA. The County would prepare a CEQA document that could be an EIR, or a Mitigated Negative Declaration to comply with CEQA. It is likely, that as part of the CEQA process, a number of mitigation measures would be developed to reduce the severity of any

identified environmental effects. If an EIR was prepared, the CEQA process would allow the County to address cumulative impacts associated with reasonably foreseeable future development at the oil field. It is likely that mitigation measures would be identified to reduce the severity of any cumulative effects. These mitigation measures could be used by the County as conditions of approval in the CUP.

Comparison to Project Objectives

In many ways the CUP for the Inglewood Oil Field could accomplish the same goals of the CSD by implementing project specific conditions to provide a means of addressing the unique compatibility concerns associated with operating an oil field in the midst of urban development. However, these conditions would be limited to the specific project applied for by the oil field operator in the CUP application. A CSD would provide for a set of permanent development standards, operating requirements and procedures for the portions of the Inglewood Oil Field within Los Angeles County that would guide future development.

The use of a CUP only would not provide this type of guidance for planning future development. The requirements of the CSD could be such that future projects, such as the steam drive facilities, could be subject to a CUP permitting process. This would have to be spelled out in the CSD provisions.

The implementation of a CSD, which is developed based upon an environmental analysis of potential future oil field development, will result in more comprehensive development standards, operating requirements and procedures than a CUP process only. In essence, the CSD would provide a comprehensive set of development standards that could be used to supplement the CUP process, as needed, for specific oil field projects in the future.

9.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines Section 15126.6(e)(2) requires the designation of an environmentally superior alternative to the Project and, if the environmentally superior alternative is the No Project Alternative, selection of an environmentally superior alternative from among the remaining alternatives.

Of the three alternatives listed above (which do not include the proposed CSD), the Conditional Use Permit alternative was found to be the environmentally superior alternative for regulating oil field operations.

Under the No Project Alternative regulatory scheme, future oil development would be subject to permits for individual wells and ancillary infrastructure with limited ability to condition the development above and beyond the requirements that currently exist in the Los Angeles County Code. None of the mitigation measures identified for the potential future oil field development could be implemented with this alternative regulatory scheme.

With the site plan review alternative, it is likely that only small groups of wells and associated ancillary infrastructure would be applied for at any one time. Under this alternative, conditions could be placed on only the development that was covered by the application. This would limit the ability of this regulatory scheme to conditions broader facility wide environmental issues.

Many of the mitigation measures identified for the potential future oil field development could not be implemented with this alternative regulatory scheme since they are field wide conditions.

The CUP regulatory scheme would allow for the implementation of more broad conditions on any proposed development. Since the CUP is a discretionary action and is subject to CEQA, it is more likely that the oil field operator would apply for development covering a number of years. Under this alternative a CEQA document would have to be prepared, and mitigation measures would be developed to reduce the severity of the identified environmental impacts. These measures could be made conditions in the CUP. The CUP process could also require the implementation of some of the facility wide mitigation measures for the potential future oil field development.

SECTION 10 - FINDINGS REGARDING MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires that when a public agency is making the finding required by Section 21081(a)(1) of the Public Resources Code, the public agency shall adopt a reporting or monitoring program for the changes made to the Project or conditions of project approval adopted in order to mitigate or avoid significant effects on the environment.

The Board hereby finds that the Mitigation Monitoring Program, which is presented as a separate document, meets the requirements of Section 21081.6 of the Public Resources Code.

SECTION 11 - STATEMENT OF OVERRIDING CONSIDERATIONS

The proposed Project is the CSD, not future oil operations, expanded or otherwise. The CSD will regulate the development of what is currently allowed by the applicable planning policies and zoning regulations and will not create additional development. The CSD would not result in any physical change to the environment, and would reduce environmental impacts of potential future development at the Oil Field through the establishment of enhanced development standards, operating requirements, and procedures.

Nevertheless, in order to evaluate the efficacy of the Initial Draft CSD, the EIR provides information regarding a Potential Future Oil Field Development Scenario. The analysis identifies and discusses significant effects that will occur as a result of the Potential Future Oil Field Development Scenario as regulated by the Initial Draft CSD.

After the mitigation measures identified in the EIR are incorporated into the Initial Draft CSD, the CSD will mitigate the effects of the Potential Future Oil Field Development to levels of insignificance except for unavoidable significant impacts on: (1) geological resources with respect to ground motion due to a seismic event, which could potentially induce surface fault rupture, differential settlement, or lateral spreading that could damage components of Oil Field infrastructure; and (2) cumulative impacts to traffic**.**

CEQA requires that the EIR address the impacts of the project on the environment, and does not require an analysis of the impacts of the environment on the project. (*Baird v. County of Contra Costa* (1995) 32 Cal.App.4th 1464.) Earthquake-related hazards, such as ground rupture, ground acceleration, and ground shaking, are common to the Los Angeles region and are not increased by the Potential Future Oil Field Development Scenario or the Project. Earthquake-related

hazards are therefore impacts of the existing environment on the Oil Field and not impacts of the Project on the environment. Accordingly, the EIR was not required to analyze whether earthquakes could have a potential impact on existing or future oil operations and infrastructure.

The EIR went beyond what CEQA required and analyzed whether ground movement due to a seismic event would potentially induce surface fault rupture, differential settlement, or lateral spreading that could damage components of oil field infrastructure. Because the southeast portion of the site is underlain by the active Newport-Inglewood Fault Zone, there is a greater than average risk of seismic impacts. Mitigation measures GR.3-1, through GR.3-4 will reduce seismic impacts to the greatest extent feasible, but not necessarily to levels below the significance criterion. Therefore, after mitigation, seismic-related impacts will remain significant and unavoidable.

Similarly, the Oil Field is bisected and surrounded by major roadways already operating at poor levels of service; therefore, any additional trips, no matter how minimal, would result in cumulatively significant traffic impacts. If all the identified mitigation measures are implemented the future conditions with related projects and the Potential Future Oil Field Development Scenario would potentially reduce the impacts to below a level of significance at four studied intersections, except for the Stocker St. and La Brea/Overhill PM peak hour, which remains a significant cumulative impact. For that reason, the cumulative traffic and circulation impacts would be considered significant and unavoidable.

Having reduced the effects of the selected Project by adopting the CSD with the inclusion of the mitigation measures, and having balanced the benefits of the selected Project against the Project's potential unavoidable significant adverse impacts, the Board hereby determines that the benefits of the Project outweigh the potential unavoidable adverse impacts, and that the unavoidable adverse impacts are nonetheless "acceptable," based on the following overriding considerations. Any one of these overriding considerations is sufficient to support the Board's determinations herein.

- The CSD establishes permanent development standards, operating requirements, and procedures for the Oil Field, which are specifically tailored for this Oil Field based on extensive environmental studies and are far more rigorous that what would otherwise be required for the future oil and gas exploration and production activities.

- The enhanced regulations in the CSD minimize impacts to the public health and safety and address unique compatibility concerns associated with the Oil Field and the surrounding communities.

- The continued oil operations will further the goals of the General Plan, which promote and protect existing mineral and oil extraction operations while protecting public safety.

- Continued oil operations at the Oil Field will support the local economy by employing approximately 110 people, whose payroll exceeds $16 million annually.

- Continued oil operations at the Oil Field will generate increased tax revenues that will help fund important public services in the community. The County received $7.49 million in tax revenue from PXP in 2007 and is expected to receive $9.3 million in 2008.

- Continued oil operations at the Oil Field generate local investment. Payments in 2007 for outside service providers in Baldwin Hills area exceeded $106 million. There are more than 1,250 individual property owners whose lands are under lease to PXP and over $44 million was paid in royalties to local property owners in 2007.

- Investments from continued oil operations at the Oil Field directly and indirectly boost the economy. Studies show that every dollar spent as part of oil operations generates three to five dollars of direct and indirect economic activity. This equals approximately $120 million per year in the County due to PXP's operations alone.

- Continued domestic oil production reduces dependence on foreign oil.

- The continued oil and gas operations at the Oil Field provide a local source of crude oil which is refined locally, thereby reducing tanker vessel and truck emissions and resulting greenhouse gases.

ATTACHMENT 9: LEGAL NOTICE OF BOARD HEARING

COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING

Legal Notice of Board Hearing

The *Legal Notice of Board Hearing and Supplemental Notice* have been submitted to the Executive Office of the Board of Supervisors.

ATTACHMENT 10: LIST OF PERSONS TO BE NOTIFIED

COUNTY OF LOS ANGELES
DEPARTMENT OF REGIONAL PLANNING

List of Persons to be Notified

The *List of Persons to be Notified* has been submitted to the Executive Office of the Board of Supervisors.